Nuneaton & Bedworth
United to Achieve

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Date: 20th November 2026

Our Ref: MM

Dear Sir/Madam,

A meeting of the **AUDIT & STANDARDS COMMITTEE** will be held in the Council Chamber, Town Hall, Nuneaton, on **Tuesday, 1 December 2026** at **6.00pm**

Yours faithfully,

TOM SHARDLOW

Chief Executive

To: All Members of the Audit & Standards Committee

Councillors L. Cvetkovic (Chair), D. Brown (Vice-Chair), J. Bonner, A. Brassington, C. Cape, S. Carvell, T. Cooper, B. Hughes, M. Kondakor, C. Morris, C. Phillips and Mr A. Morgan.

The Council is committed to providing a safe and respectful environment for both our staff, our customers and elected members. As such, please be advised that any form of abuse, aggression, or disrespectful behaviour towards our team will not be tolerated under any circumstances.

A G E N D A

PART I - PUBLIC BUSINESS

1. ANNOUNCEMENTS

   To advise the meeting participants of the procedure that will be followed by the Members of the committee.

   A fire drill is not expected, so if the alarm sounds please evacuate the building quickly and calmly. Please use the stairs and do not use the lifts. Once out of the building, please gather outside Lloyds Bank on the opposite side of the road.

   Exit by the door by which you entered the room or by the fire exits which are clearly indicated by the standard green fire exit signs.

   If you need any assistance in evacuating the building, please make yourself known to a member of staff.

   Please also make sure all your mobile phones are turned off or set to silent.

2. APOLOGIES - To receive apologies for absence from the meeting.

3. MINUTES – To confirm the minutes of the meeting of the Audit and Standards Committee held on 1st December 2026, attached **(Page 4).**

4. DECLARATIONS OF INTEREST

   To receive declarations of Disclosable Pecuniary and Other Interests, in accordance with the Members' Code of Conduct.

   Declaring interests at meetings

   If there is any item of business to be discussed at the meeting in which you have a disclosable pecuniary interest or non- pecuniary interest (Other Interests), you must declare the interest appropriately at the start of the meeting or as soon as you become aware that you have an interest.

   Arrangements have been made so that interests that are declared regularly by members can be viewed in a schedule on the Council website (Councillor Schedule of Declarations of Interests for Meetings). Any interest noted in the schedule on the website will be deemed to have been declared and will be minuted as such by the Democratic Services Officer. As a general rule, there will, therefore, be no need for those Members to declare those interests as set out in the schedule.

   There are, however, TWO EXCEPTIONS to the general rule:

   1. When the interest amounts to a Disclosable Pecuniary Interest that is engaged in connection with any item on the agenda and the member feels that the interest is such that they must leave the room. Prior to leaving the room, the member must inform the meeting that they are doing so, to ensure that it is recorded in the minutes.
   2. Where a dispensation has been granted to vote and/or speak on an item where there is a Disclosable Pecuniary Interest, but it is not referred to in the Schedule (where for example, the dispensation was granted by the Monitoring Officer immediately prior to the meeting). The existence and nature of the dispensation needs to be recorded in the minutes and will, therefore, have to be disclosed at an appropriate time to the meeting.

Note: Following the adoption of the new Code of Conduct, Members are reminded that they should declare the existence and nature of their personal interests at the commencement of the relevant item (or as soon as the interest becomes apparent). If that interest is a Disclosable Pecuniary or a Deemed Disclosable Pecuniary Interest, the Member must withdraw from the room.

Where a Member has a Disclosable Pecuniary Interest but has received a dispensation from Audit & Standards Committee, that Member may vote and/or speak on the matter (as the case may be) and must disclose the existence of the dispensation and any restrictions placed on it at the time the interest is declared.

Where a Member has a Deemed Disclosable Interest as defined in the Code of Conduct, the Member may address the meeting as a member of the public as set out in the Code.

Note: Council Procedure Rules require Members with Disclosable Pecuniary Interests to withdraw from the meeting unless a dispensation allows them to remain to vote and/or speak on the business giving rise to the interest.

Where a Member has a Deemed Disclosable Interest, the Council's Code of Conduct permits public speaking on the item, after which the Member is required by Council Procedure Rules to withdraw from the meeting.

5. PUBLIC CONSULTATION - Members of the Public will be given the opportunity to speak on specific agenda items, if notice has been received.

   Members of the public will be given three minutes to speak on a particular item and this is strictly timed. The chair will inform all public speakers that: their comments must be limited to addressing issues raised in the agenda item under consideration: and that any departure from the item will not be tolerated.

   The chair may interrupt the speaker if they start discussing other matters which are not related to the item, or the speaker uses threatening or inappropriate language towards Councillors or officers and if after a warning issued by the chair, the speaker persists, they will be asked to stop speaking by the chair. The chair will advise the speaker that, having ignored the warning, the speaker's opportunity to speak to the current or other items on the agenda may not be allowed. In this eventuality, the chair has discretion to exclude the speaker from speaking further on the item under consideration or other items of the agenda.

6. AUDITOR'S ANNUAL REPORT – a report of the Strategic Director – Resources and External Auditors, attached **(Page 7).**

7. INTERNAL AUDIT PROGRESS REPORT - a report of the Audit Manager, attached **(Page 45).**

8. TREASURY MANAGEMENT 26/27 – MID YEAR REVIEW – a report of the Treasury and Technical Business Partner, attached **(Page 76).**

9. REVIEW OF THE REGISTER OF MEMBERS' INTERESTS AND THE GIFTS AND HOSPITALITY REGISTER 2025 – 2026 - a report of the Monitoring Officer, attached **(Page 96).**

10. ANY OTHER ITEMS - which in the opinion of the Chair should be discussed as a matter of urgency because of special circumstances (which must be specified).

NUNEATON AND BEDWORTH BOROUGH COUNCIL

AUDIT & STANDARDS COMMITTEE **15th September 2026**

A meeting of the Audit & Standards Committee was held on Tuesday, 15th September 2026 in the Council Chamber, Town Hall, Nuneaton.

Present

Councillor L. Cvetkovic – Chair

Councillors: D. Brown (Vice-Chair), J. Bonner, S. Carvell, T. Cooper, B. Hughes, M. Kondakor, C. Morris, C. Phillips, P Smith (substitute for A. Brassington) and Mr A. Morgan.

Apologies: Councillors A. Brassington and C. Cape.

PART I – PUBLIC BUSINESS

ASC11 **Minutes**

RESOLVED that the minutes of the Audit and Standards Committee meeting held on 23rd June 2026 be approved and signed by the Chair.

ASC12 **Declarations of Interest**

RESOLVED that the declarations of interests are as set out in the Schedule which can be viewed on the Council website (Councillor Declarations of Interests).

ASC13 **External Audit Build Back Plan**

The Strategic Director – Resources and External Auditors provided Committee Members with an update on the plan to rebuild assurance and achieve a clean audit option on the Statement of Accounts.

RESOLVED that the External Audit Build Back Plan be noted.

ASC14 **External Audit Plan 2025/26**

A report of the Strategic Director – Resources and External Auditors gave Members the opportunity to consider the Audit Plan for the Statement of Accounts 2025/26.

RESOLVED that the External Audit Plan 2025/26 be noted.

ASC15 **Planning Applications Committee**

The Assistant Director – Democracy and Governance, Assistant Director – Planning, and Planning Manager (Development Control) provided a report which informed Members of the Government's introduction of the National Scheme of Delegation for planning functions and the statutory requirements relating to the operation and size of planning committees.

Necessary amendments to the Constitution include the Planning Applications Committee Terms of Reference and Scheme of Delegation, to ensure compliance with the Town and Country Planning (Discharge of Local Planning Authority Functions) (England) Regulations 2026 and associated statutory guidance.

RESOLVED that
IT BE RECOMMENDED TO FULL COUNCIL that

a) the Council notes the requirements of the National Scheme of Delegation and associated statutory guidance;
b) the Constitution, including the Planning Applications Committee Terms of Reference and Planning Scheme of Delegation, be amended to ensure compliance with the 2026 Regulations as per Appendices A.1 through to D.2;
c) authority be delegated to the Assistant Director – Democracy and Governance in consultation with the Assistant Director – Planning, to make any consequential constitutional amendments required to implement the new arrangements further to legislation;
d) the Chair of Planning Applications Committee be designated as the Council's "Nominated Member" for the purposes of the Regulations and the Vice Chair being the nominated substitute;
e) the Assistant Director – Planning be designated as the Council's "Nominated Officer" for the purposes of the Regulations and the Planning Manager (Development Control) being the nominated substitute;
f) it be noted the Planning Applications Committee membership is within the statutory maximum committee size of thirteen (13) Members;
g) it be noted that Training for Members and Officers has or will be scheduled prior to the end of October 2026;
h) it be noted that Information that explains how and when the Council will consult on planning applications will need to be available on the Council's website; and
i) a review by Members of the Audits and Standards Committee be carried out after a period of 6 months from 1st November 2026, and any recommendations from the review be made to Full Council.

ASC16 **Internal Audit Progress Report**

The Audit Manager presented a report which provided the Committee with an update on progress against the approved Internal Audit Plan, which details the performance and activity of Internal Audit since the last Progress Report presented to this Committee.

RESOLVED that the Internal Audit Progress Report be considered and noted, and any issues identified be subject to a follow-up report as appropriate, including:

a) Food Hygiene/Safety Inspections – a briefing update can be supplied to Members;
b) Fire Risk Management – a new Estates Officer has been appointed and they will be tasked with looking at Health and Safety certifications and Fire Risk Management; and
c) Grounds Maintenance, including getting value for money and payment methods relating to performance, areas chosen for random sampling, and effective monitoring of the contract – Grounds Maintenance will be on the agenda of the Overview and Scrutiny Panel taking place on 15th October 2026, and all Members can attend this meeting.

ASC17 **Treasury Management 26/27 – Quarter 1 Review**

The Treasury and Technical Business Partner reported that the Council is required through the CIPFA Code of Practice on Treasury Management (the Code) and the

CIPFA Prudential Code for Capital Finance in Local Authorities (the Prudential Code) to report to full Council the mid-year review.

The report set out the Council's treasury position as at 30th June 2026.

RESOLVED that
IT BE RECOMMENDED TO FULL COUNCIL that the Treasury Management Report for 2026/27 – Q1 Report be noted.

Councillor M. Kondakor abstained from voting on this item. All other Members supported the recommendation.

ASC18 **Annual Governance Statement**

A report of the Assistant Director – Democracy and Governance gave Members the opportunity to approve the 2025/2026 Annual Governance Statement

RESOLVED that the Annual Governance Statement 2025/2026 (including the review of corporate governance and internal control) be considered and approved.

ASC19 **Constitution Update – Report from Constitution Review Working Party – Proposal for an Annual Report of the Shareholder Committee**

A report of the Elections and Democratic Services Manager (Deputy Monitoring Officer) provided an opportunity for Members to consider an Annual Report of the Shareholder Committee.

RESOLVED that
IT BE RECOMMENDED TO FULL COUNCIL that

a) the Constitution be amended to require the Shareholder Committee to produce an Annual Report for presentation to the final meeting of Full Council in each Municipal Year. Any commercially sensitive information could be included within confidential section or a separate confidential report where necessary; and
b) the report be a standalone annual report, rather than being included within the annual report of the OSPs.

ASC20 **Audit and Standards Committee Work Programme 2026/27**

RESOLVED that

a) the work programme 2026/27 be noted; and
b) a review of the Government Reforms on Planning Committees – Changes to Constitution (Planning Applications Committee agenda item) be added to the work programme. The review to be carried out after a period of 6 months from 1st November 2026 (earliest Committee would be April 13th 2027).

Chair _____

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 6

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Audit and Standards Committee

Date of Meeting: 1st December 2026

Subject: Auditor's Annual Report

Portfolio: Not Applicable

Responsible Officer: Strategic Director – Resources

Corporate Plan – Theme: Your Council

Corporate Plan – Aim: Strive for transparency and accountability, in all that we do
Increase public scrutiny

Ward Relevance: All

Public or Private: Public

Amendment to Budget: No **Council Tax Related**: No

Recommendation to Council: No

Forward Plan: Not Applicable

Subject to Call-in: Not Applicable

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1. Purpose of report

1.1. To provide the Annual Auditor's Report for 2025/26.

2. Recommendations

2.1. That the Auditor's Annual Report for 2025/2026 be considered;
2.2. The Committee note the recommendations which have been actioned and closed contained on pages 33 and 34 of the appendix; and
2.3. The Committee consider and note the Management Response against the two areas of weakness identified.

3. Background

3.1. The External Auditor, Azets have been working with the Council to finalise their opinion on the value for money arrangements in place for 2025/26.

4. Body of report and reason for recommendations

4.1. The AAR provides detail around the Council's value for money arrangements, recommendations to improve and management's comments regarding the recommendations.

5. Consultation with the public, members, officers and associated stakeholders

5.1. Statutory Officers have been consulted and have had specific meetings with the External Auditor.

6. Financial Implications

6.1. None.

7. Legal Implications

7.1. None.

8. Equalities implications

8.1. No equalities implications have been identified.

9. Health implications

9.1. No specific health implications have been identified.

10. Environmental implications

10.1. No direct environmental implications have been identified.

11. Section 17 Crime and Disorder Implications

11.1. No direct Section 17 crime and disorder implications have been identified.

12. Risk management implications

12.1. Recommendations regarding weaknesses in the governance arrangements have been reviewed and risks are being mitigated..

13. Human resources implications

13.1. No direct human resource implications have been identified.

14. Biodiversity Implications

14.1. No direct biodiversity implications have been identified

15. Local Government Reorganisation (LGR) Implications

15.1. No direct LGR implications have been identified.

16. Options considered and reason for their rejection

16.1. No other options considered as the report has to be presented to Audit & Standards Committee by 30th November. This is a statutory requirement and therefore not reporting isn't an option.

17. Conclusion

17.1. Although weaknesses in governance arrangements have been noted, the Council is on an upward trajectory and is working with external audit closely to ensure measures are in place to mitigate and improve.

18. Appendices

18.1. Please note the following appendices:

i. Appendix A – Annual Auditor's Report 2025/26

19. Background papers

19.1. Please note the following background papers:

i. Statement of Accounts 2025/26

20. Report Writer Details:

Officer Job Title: Strategic Director – Resources

Officer Name: Vicki Summerfield



Nuneaton and Bedworth Borough Council

Auditor's Annual Report

Year ended 31 March 2026

November 2026

Your key team members

Rebecca Lister
Key Audit Partner
Rebecca.Lister@azets.co.uk

Azola Dudula
Manager
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In-Charge auditor
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Headlines from our audit

Purpose of this report

This Auditor's Annual Report provides a summary of the findings and key issues arising from our audit of the Council for 2025/26. This report has been prepared in line with the requirements set out in the Code of Audit Practice and supporting guidance published by the National Audit Office and is required to be published by the Council alongside the annual report and accounts.

Our responsibilities

Financial statements

We have been appointed to provide an opinion as to whether the accounts give a true and fair view of the financial position of the Council and of its income and expenditure during the year and to confirm whether the accounts have been prepared in line with the CIPFA/LASSAC Code of Practice in Local Authority Accounting ('the Code').

We have started to rebuild assurance in relation to prior year disclaimed years, but due to the challenges of undertaking an audit where the previous three years have been disclaimed because of the local authority backstop, it will not be possible for us to rebuild sufficient assurance to support an unmodified audit opinion ahead of the backstop date of 31 January 2027. The limitations imposed from an ongoing lack of assurance on many of the opening balances are pervasive and as a result we are unable to form an opinion on the 2025/26 financial statements. We therefore intend to disclaim our 2025/26 audit report.

Narrative report and Annual Governance Statement

We assess whether the Narrative report and Annual Governance Statement is consistent with our knowledge of the Council.

We are unable to conclude that the other information included in the statement of accounts is consistent with our knowledge of the Council and the financial statements we have audited. This is because it has not been possible to undertake sufficient audit work to reach a conclusion before the statutory backstop date of 31 January 2027.

Value for money

We are required under Section 20(1)c of the Local Audit and Accountability Act 2014 to satisfy ourselves that the Council has made proper arrangements for securing economy, efficiency and effectiveness (value for money) in its use of resources and provide a summary of our findings in the commentary in this report.

We are required to report if we have identified any significant weaknesses as a result of this work.

We have identified one significant weaknesses in the arrangements for securing at economy, efficiency and effectiveness in the use of resources at the Council.

Headlines from our audit

Statutory powers

We may exercise other powers we have under the Local Audit and Accountability Act 2014. These powers include issuing a Public Interest Report, issuing statutory recommendations, issuing an Advisory Notice, applying for a judicial review, or applying to the courts to have an item of expenditure declared unlawful.

Public interest report	Statutory recommendations	Advisory notice	Judicial review	Application to the court
We may issue a Public Interest Report if we believe there are matters that should be brought to the attention of the public. If we issue a Public Interest Report, the Council is required to consider it and to bring it to the attention of the public. **We have not issued a Public Interest Report this year.**	We may make written recommendations to the Council under Schedule 7 of the Local Audit and Accountability Act. If we do this, the Council must consider the matter at a general meeting and notify us of the action it intends to take (if any). We also send a copy of this recommendation to the relevant Secretary of State. **We have not made any statutory recommendations this year.**	We may issue an advisory notice if we believe that the Council, or an officer of the Council, has, or is about to, incur an unlawful item of expenditure or has, or is about to, take a course of action which may result in a significant loss or deficiency. If we issue an advisory notice, the Council is required to stop the course of action for 21 days, consider the notice and then notify us of the action it intends to take and why. **We have not issued an advisory notice this year.**	We may make an application for judicial review of a decision of the Council, or of a failure to act by the Council, which it is reasonable to believe would have an effect on the accounts of that body. **We did not make an application for judicial review this year.**	We may apply to the courts for a declaration that an item of expenditure the Council has incurred is unlawful. **We have not applied to the courts this year.**

Headlines from our audit

Findings and recommendations

Findings from our financial statements audit	Recommendations arising from our financial statements audit	Key recommendations arising from our value for money work	Other recommendations arising from our value for money work
Detailed findings from our audit of the financial statements, including our consideration of significant risks, are communicated in the following reports: • audit opinion on the financial statements for the year ended 31 March 2026 • audit findings (ISA 260) report to Those Charged with Governance **Our audit findings report will be reported to the Council's Audit and Standard Committee in January 2027.**	Recommendations relating to internal controls and other matters arising from our financial statements work are contained in the audit findings (ISA 260) report. **The work undertaken to date as part of our financial statements audit has not identified any matters that would require us to reconsider the significant weaknesses or recommendations reported in this Auditor's Annual Report.**	We provide a summary of our findings in respect of value for money in the commentary in this report. Where we identify significant weaknesses as part of our review of the Council's arrangements to secure value for money, we make key, or essential, recommendations setting out the actions that should be taken by the Council. **We have made one key recommendation this year.**	We make other recommendations if we identify areas for improvement which do not relate to identified significant weaknesses **We have made other recommendations as part of our audit work this year. We have closed the last open "other" recommendations raised in previous year.**

Value for money

We are required to consider whether the Council has established proper arrangements to secure economy, efficiency and effectiveness in its use of resources, as set out in the NAO Code of Practice 2024 and the requirements of Auditor Guidance Note 3 ('AGN 03').

We have completed our value for money work. Our detailed findings are reported in the following commentary in this report.

Reporting criteria	Planning – risk of significant weakness identified?	Final – significant weakness identified?	Recommendations made		
			Statutory	Key	Other
Financial sustainability How the body plans and manages its resources to ensure it can continue to deliver its services	No	No	No	No	No
Governance How the body ensures it makes informed decisions and properly manages risk	Yes	Yes	No	Yes	Yes
Improving economy, efficiency and effectiveness How the body uses information about its costs and performance to improve the way it manages and delivers its services	No	No	No	No	No

We have concluded there is one significant weakness in the Council's arrangements and so are not satisfied that the Council has made proper arrangements for securing economy, efficiency and effectiveness in its use of resources.

Value for money

Councils are responsible for putting in place proper arrangements for securing economy, efficiency and effectiveness in their use of resources. This includes managing key operational and financial risks and taking properly informed decisions so that they can deliver their objectives and safeguard public money.

As auditors, we are required to consider whether the Council has established proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

We performed risk assessment procedures at the audit planning stage to identify any potential areas of significant weakness which could result in value for money not being achieved. This included considering the findings from other regulators and internal auditors, reviewing records at the Council and performing procedures to gain an understanding of the high-level arrangements in place. The resulting risk areas we identified were set out in our audit plan. We have not identified any additional areas for consideration during our audit.

For each identified risk area, we performed further procedures during our audit to consider whether there were significant weaknesses in the processes in place at the Council to achieve value for money.

The NAO Code of Audit Practice requires us to structure our commentary on VFM arrangements under three reporting criteria: financial sustainability, governance and improving economy, efficiency and effectiveness.

We have set out on the following pages our commentary and findings on the arrangements at the Council in each area.

In addition to our financial statements work we performed a range of procedures to inform our value for money commentary, including:

- Meeting with management and regular meetings with senior officers
- Interviews as appropriate with other executive officers and management
- Review of Council and committee reports and attendance at audit & Standard committee meetings
- Reviewing reports from third parties
- Review of the Council's Annual Governance Statement and Narrative Report and other publications
- Considering the work of internal audit and the counter fraud function
- Consideration of other sources of external evidence.

Value for money

Overview

Nuneaton and Bedworth Borough Council (the Council) is a district council with borough status in Warwickshire. It works with five other district and borough councils, local parish and town councils and Warwickshire County Council (which includes Warwickshire Fire and Rescue Service) in a two-tier local government system. The administrative area also includes the Warwickshire Police and Crime Commissioner and Warwickshire Constabulary. The Council serves a population of circa 141,565 people, a 5.5% increase since 2021. The Council provides social housing from an in-house Housing Revenue Account and has entered into a number of large capital and investment schemes to promote regeneration, attract business to the area. Some of these investment schemes carry significant financial risk.

Like all councils, and the wider local government sector, the Council continues to face significant challenges. The Committee of Public Accounts report on Local Government Financial Sustainability published in June 2025 states that "Local government finance is in a perilous state. Despite a real terms funding increase in central government grants, council tax and locally retained business rates of 4%, over the period 2015–16 to 2023–24, the amount per person fell over the same period. Funding has not kept pace with population growth, demand for services, complexity of need, or the rising costs of delivering services".

Significant increases in inflation in 2021 and 2022 increased cost pressures on all councils' revenue and capital expenditure and although these fell during 2023 and 2024 they remained 2.6% higher in March 2026 than they were in March 2021. As of 2025/26, local authority core spending power is about 9% in real terms below its 2010/11 levels in England as a whole, and much lower for some authorities.

The Government has introduced a three-year funding settlement covering 2026/27 to 2028/29, the first multi-year settlement for a decade. The provisional settlement was published on 17 December 2025 and the final settlement on 24 February 2026. In total the settlement distributes £83.5 billion to local authorities in 2026/27, rising to £90.5 billion in 2028/29 (a 4.3% change in real terms). Most of this is in the form of un-ringfenced funding and council tax revenue. However, the distribution of funding has changed as a result of the Fair Funding Review 2.0 and as a result some authorities have gained more than others, and some have ended up with less funding than before. For Nuneaton and Bedworth Borough Council the provisional settlement shows a decline in Core spending Power from 2024-25 to 2027-28.

As at 31 March 2026 Nuneaton and Bedworth Borough Council has a reasonable level of general fund reserves compared to other district councils nationally. However, these could be significantly depleted over the next few years if macro-economic conditions are unfavourable and the uncertainty inherent in the Council's cost and income assumptions do not crystallise in the Council's favour.

Value for money

Local government reorganisation

Following consultation, the UK Government issued proposals for a proposed restructure of local government in Warwickshire in July 2026. The proposals were for the current two-tier structure (district/borough councils plus Warwickshire County Council) to be replaced by two new unitary authorities from 1 April 2028. However, on 7 September the Minister for Local Government, Devolution and Regional Growth wrote to Council leaders to advise them that the decisions made in July will be further considered under a review of the Local Government Reorganisation programme. Until this review concluded, Councils were advised to cease work on implementing the decisions announced in July.

Local Government Reorganisation (LGR), and the subsequent pause of LGR, have created significant uncertainty for the Council. Prior to the pause of LGR and during 2025/26 councils would have needed to consider the risk of the loss of key individuals given uncertainty about the future of their roles. LGR may also have resulted in an incentive for more short-term decision making in respect of the use of reserves by the Council. Following the Government's announcement on 29 October 2026 that proposals for local government reorganisation in Warwickshire would continue to progress. New councils will be established for 2029, with elections to shadow councils in May 2028. It is important to make sure that proper governance arrangements remain in place, and these have been considered as part of our 2025/26 value for money work.

It is recognised that any transition and reorganisation will require significant management time to ensure the benefits are identified and plans are put in place to realise them post-transition. A significant amount of work already went into planning and progressing LGR before the programme was paused, plans have now been reactivated for five counties including Warwickshire. This may have diverted attention from the realisation of savings plans or make the achievement of previously planned savings less likely. Such risks will therefore need to be incorporated into medium term financial plans which may require updating if changes in the scope or timing of Local Government reorganisation in Warwickshire are made.

Members, and in particular the Audit & Standards Committee need to be satisfied that:

- where earmarked reserves are being utilised, they are being utilised for their intended purpose;
- reserve balances remain at an appropriate and prudent level; and
- balanced budgets continue to be set in line with the Council's statutory duties.

Effective governance and stewardship will remain key, particularly in the operation of the Audit & Standards Committee , delivery of internal audit and execution of the risk management processes.

AGN 03 (reissued on 23 March 2026) clarifies that arrangements bodies put in place to manage reorganisation fall within the general scope of VFM arrangements work, and the risk of significant weaknesses may increase where the body is involved in or planning such activities. AGN 03 includes some illustrative weaknesses that might apply, which we considered when carrying out our initial risk assessment. Where we identified potential weaknesses at the Council due to Local Government Reorganisation and the programme's subsequent pause, we included them in our Audit Plan under the relevant criteria and have reported the results of our follow up work under the VFM criterion below.

Value for money: financial sustainability

This relates to how the Council plans and manages its resources to ensure it can continue to deliver its services.

We considered the following areas:

- how the Council identifies all the significant financial pressures that are relevant to its short and medium-term plans and builds these into the plans;
- how the Council plans to bridge its funding gaps and identifies achievable savings;
- how the Council plans finances to support the sustainable delivery of services in accordance with strategic and statutory priorities;
- how the Council ensures that its financial plan is consistent with workforce, capital, investment, and other operational plans, which may include working with other local public bodies as part of a wider system; and
- how the Council identifies and manages risks to financial resilience, such as unplanned changes in demand and assumptions underlying its plans.

General fund

At 31 March 2026 the Council's draft accounts show that the general fund stood at £2.9m, a slight increase from the general fund balance at 31 March 2025 of £2.4m. The level of earmarked general fund reserves increased during the year from £19m to £23.8m, meaning the overall level of usable general fund reserves available to the Council now stands at £26.7m, compared to £21.4m a year ago.

The Council's total usable general fund reserves at 31 March 2026 is medium compared with other district councils as shown in the graph overleaf. This is reasonable level of reserves compared to the Council's net expenditure on services of £44m in 2025/26. This level of reserves provides a good a buffer for unexpected overspends.

Earmarked reserves

Whilst earmarked reserves can be utilised if Members decide to change their use, they are earmarked for specific purposes in anticipation of specific costs. The general fund balance of £2.9m as at 31 March 2026 is the true reserve for 'unanticipated' cost pressures. However, the earmarked general fund reserves also include Risk Based Reserves, General Revenue Reserves and Financial Planning Reserve which total £18.1m, which are also available to further support financial resilience and manage risk, over and above the general fund position.

Housing revenue account fund

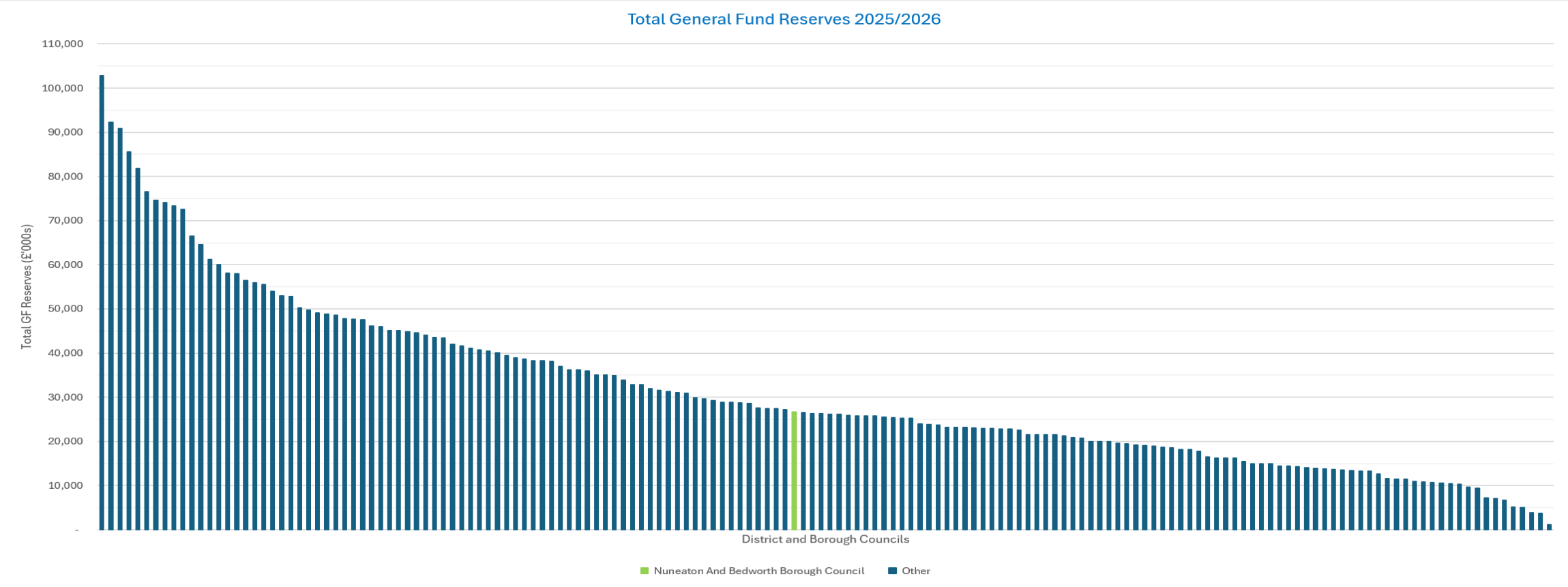
At 31 March 2026 the Council's draft accounts show that the housing revenue account (HRA) fund stood at £3.3m, a slight increase from the HRA balance at 31 March 2025 of £2.9m. The level of earmarked HRA reserves remain the same between the current and prior year at £5.5m, meaning the overall level of usable HRA reserves available to the Council now stands at £8.8m, compared to £8.4m a year ago.

The Council's total HRA reserves at 31 March 2026 is medium compared with other district councils as shown in the graph on page 13. This is a reasonable level of reserves compared to the Council's net expenditure on housing services of £8.6m in 2025/26. This level of reserves provides a good buffer for unexpected overspends.

Value for money: financial sustainability

General Fund Reserve Balances

The table below shows how the Council's general fund reserve balances compare with other district councils.



Source: Draft published 2025/26 financial statements

Value for money: financial sustainability

General Fund Reserve Balances

The Council's General Fund net assets of £26.7m at 31 March 2026 comprise of a General Fund balance of £2.9m and General Fund earmarked reserves of £23.8m. The General Fund balance increased from £21.4m in 2024/25, reflecting a net surplus generated during the year and demonstrating that the Council has continued to strengthen its financial resilience rather than drawing upon reserves to support day-to-day service delivery. The accounts attribute this improved position to stronger business rates performance, additional government grant income and reduced reliance on planned reserve drawdowns due to higher investment returns and lower borrowing costs.

The General Fund balance of £2.9m remains available to manage unforeseen events and short-term financial shocks. While relatively modest in comparison to total reserves, it continues to provide a core financial buffer and has increased from £2.4m in the prior year, indicating that the Council was able to generate additional resources whilst maintaining service delivery.

The majority of General Fund reserves are held as earmarked reserves totalling £23.8m, an increase of £4.8m from the previous year's £18.99m. The most significant component is the Financial Planning Reserve (£9.1m), which increased from £1.6m in the prior year. Of the £7.5m increase, £1.7m relates to new contributions during the year (increase), while the remaining £5.8m arose from movements between reserves following a review of reserve need. This reserve represents approximately 38% of the Council's total General Fund earmarked reserves. Alongside General Revenue Reserves (£6.1m), Capital Earmarked Reserves (£5.7m) and Risk Based Reserves (£2.9m), this demonstrates that the Council has designated resources to manage known future financial pressures, and provide mitigation against emerging risks. The increase in reserves is particularly relevant given the uncertainty arising from Local Government Reorganisation, changes to local government funding arrangements and the future cost implications of new statutory responsibilities such as food waste collection.

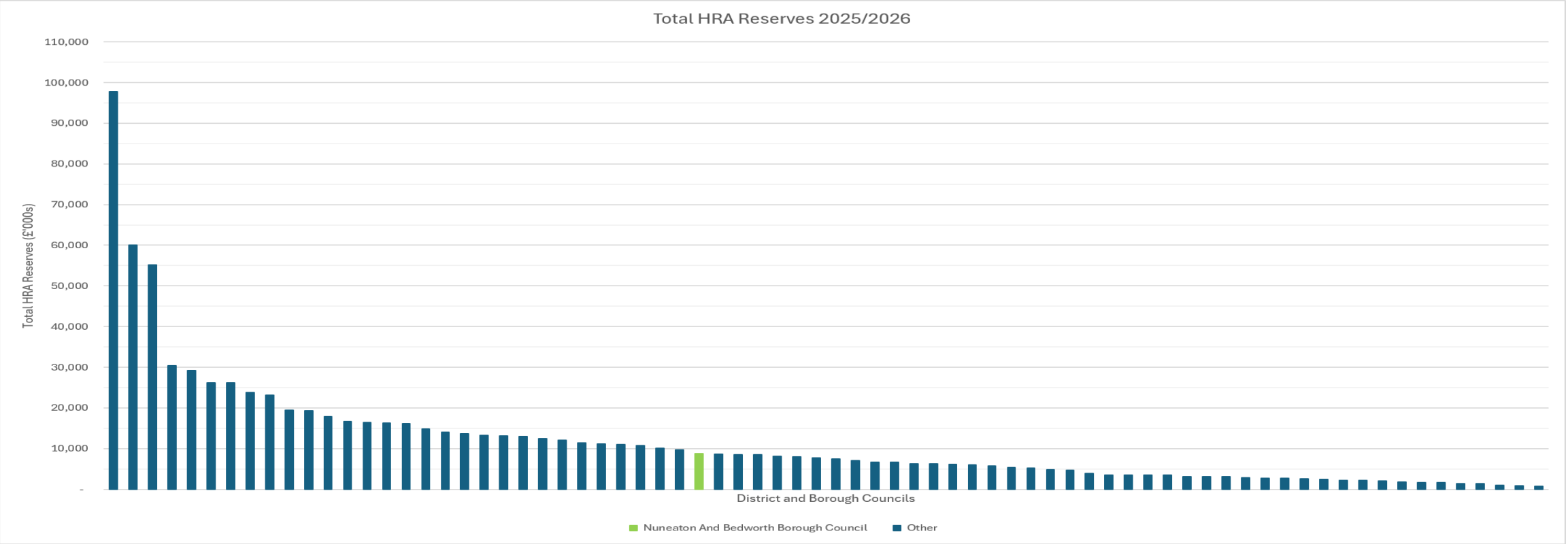
Comparison with other district and borough councils indicates that Nuneaton And Bedworth Borough Council's reserve position is broadly consistent with its peer group and does not appear to be either unusually high or low. Several neighbouring and regional authorities maintain significantly larger reserve balances, including Rugby Borough Council, North Warwickshire Borough Council, Stafford Borough Council and East Staffordshire Borough Council, reflecting a stronger overall reserve base. The benchmarking does not indicate a concern regarding the adequacy of reserves. Rather, it suggests that the Council maintains a reserve position that is proportionate relative to its peers, providing financial resilience without appearing excessive. Further when comparing the reserves from year-to-year since the last full audited period there is no reason to suggest that the Council is drawing down the reserves ahead of the implementation of local government reorganisation, rather we see an increase from 2023/24 after a decline in 2022/23 and 2021/22. The increase does not also indicate that the Council is delaying in making key decision as we have noted that the Council continue to work through the capital programme, with some capital projects completed in recent years while the Council is working through Local Government Reorganisation.

The General Fund reserve position demonstrates a planned and sustainable approach to financial management. Reserve levels increased during the year, the Council avoided the need for significant reserve drawdowns, and earmarked balances have been strengthened to support identified future risks and commitments. Consequently, the reserve position provides evidence that the Council has maintained adequate financial resilience and continues to use reserves strategically rather than relying on them to fund recurring expenditure pressures.

Value for money: financial sustainability

Housing Revenue Account Reserve Balances

The table below shows how the Council's HRA balances compare with other district councils.



Source: Draft published 2025/26 financial statements

Value for money: financial sustainability

Housing Revenue Account Reserve Balances

The Council's Housing Revenue Account (HRA) reserves increased from £8.4m to £8.8m, reflecting a net increase of £0.4m during the year. The HRA was budgeted to break even, however a surplus was achieved due to increased rental income and lower than anticipated management expenditure, which more than offset higher capital contributions. This indicates that the HRA continued to generate sufficient resources to meet operational requirements while strengthening its reserve position. As the HRA is ring-fenced, these balances are available solely to support council housing services and cannot be used to support General Fund activities. The growth in the reserves balance provides a financial buffer to manage unforeseen housing-related expenditure, fluctuations in rental income, and emerging risks associated with the management and maintenance of the Council's housing stock.

The Council also maintained HRA earmarked reserves of £5.5m, with no movement from the prior year. The stability of these earmarked reserves suggests the Council continues to hold resources for specific housing purposes and future commitments rather than utilising them to support annual expenditure pressures. The HRA transferred balances into the Major Repairs Reserve during the year, demonstrating an ongoing commitment to maintaining and investing in the housing stock while preserving earmarked resources for planned housing projects and future capital investment requirements. This approach supports the long-term sustainability of the HRA and reduces the risk that significant investment needs will need to be funded from future rental income alone.

HRA reserves against other stock-holding councils indicates that Nuneaton And Bedworth Borough Council's HRA reserve position is broadly in line with authorities managing housing portfolios of a similar scale. The balance is higher than a number of authorities operating with relatively modest HRA reserves, indicating a greater capacity to absorb short-term housing related financial pressures, whilst remaining below several larger housing authorities that have accumulated more substantial HRA balances to support extensive housing investment programmes and development activity.

The benchmarking suggests that the Council maintains a prudent level of HRA reserves relative to its peers. Combined with the in-year HRA surplus and the continued maintenance of earmarked housing reserves, the reserve position provides capacity to respond to future housing management, maintenance and investment requirements while supporting the long-term sustainability of the HRA. This is particularly relevant given the Council's ongoing programme of major repairs and new housing development, which will require sufficient financial resilience to manage future expenditure commitments.

In September 2026, the Regulator of Social Housing issued a C3 consumer judgement, identifying serious concerns in relation to housing repairs, health and safety compliance, asset information management and regulatory reporting. The judgement highlighted substantial backlogs of overdue fire and water safety actions, weaknesses in monitoring repairs performance, limitations in housing data systems and historical compliance issues in key safety areas. The Council is implementing an improvement programme to address these matters, which is likely to require additional investment in systems, service delivery, compliance activities and organisational capacity. Although the judgement was issued after the 2025/26 financial year, the remedial actions required are expected to place financial and operational pressures on the Housing Revenue Account in future years and may increase reliance on available reserves should improvement costs exceed existing budget provisions.

Value for money: financial sustainability

Medium term financial Plan

Nuneaton and Bedworth Borough Council prepare a Medium Term Financial Plan. The MTFP for 2025/26 to 2028/29 is a rolling four-year plan that sets out how the Council will deliver services that meet local needs while achieving value for money and operating within available resources. Although the MTFP primarily relates to the General Fund, it establishes key financial principles that are also reflected within the Housing Revenue Account (HRA) Business Plan. The Council's Housing Strategy (2024 to 2034), which aligns with the Corporate Plan, provides the overarching framework for housing activity and investment.

The MTFP recognises that maintaining a secure financial position is essential to the delivery of sustainable budgets and that effective financial management is increasingly important in a challenging financial environment. The Council therefore seeks to balance current service demands with the need to maintain long-term financial resilience and sustainability. The revised Medium Term Financial Plan was presented to Cabinet in November 2022 and is updated annually through the budget-setting process. The latest Medium Term Financial Plan (MTFP) incorporates the approved 2025/26 budget and demonstrates that the Council has achieved a balanced budget position for the year.

2025/26 General Fund Budget and Medium-Term Financial Plan

The MTFP is supported by the Capital Strategy, Capital Programme, and Treasury Management Strategy , which collectively provide the framework for financial planning, resource allocation, borrowing decisions, treasury management activity and the use of reserves. These strategies support the Council's approach to funding service priorities, delivering capital investment and maintaining financial resilience over the medium term.

The financial plan incorporates a range of assumptions regarding external funding, including Business Rates income and retention arrangements, Revenue Support Grant, Recovery Grant, homelessness funding, Extended Producer Responsibility funding and other government grant streams. Assumptions have also been made regarding future Local Government Finance Settlements, including a reset of the Business Rates Retention Scheme and the cessation of New Homes Bonus from 2026/27. While these assumptions reflect the best information available at the time of budget setting, the Council acknowledges the ongoing uncertainty surrounding future local government funding reforms and the wider funding regime. Consequently, funding levels beyond the current settlement period remain uncertain and could have a significant impact on the Council's longer-term financial position.

Earlier iterations of the MTFP before final Settlement Funding identified forecast budget gaps of £2.1m in 2026/27, £4.4m in 2027/28 and £4.7m in 2028/29, broadly consistent with the findings of the Corporate Peer Challenge, which highlighted a potential funding gap of approximately £11.0m over the medium term. Following confirmation of the Local Government Finance Settlement, refinement of key planning assumptions and the identification of £0.25m of surplus in 2025/26, the Council achieved a balanced budget for 2025/26 and is forecasting a small surplus in 2026/27. However, financial pressures remain from 2027/28 onwards and the Council continues to forecast the use of reserves over the life of the plan, including the funding of previously approved projects and capital investment. As a result, earmarked reserves are expected to reduce over the medium term. The MTFP also assumes that Nuneaton and Bedworth Borough Council will continue to operate as a standalone authority throughout the planning period. However, uncertainty associated with local government reorganisation and wider funding reforms presents an additional risk to the Council's longer-term financial sustainability and the delivery of its financial strategy.

Value for money: financial sustainability

The MTFP has been developed using prudent assumptions, including annual Council Tax increases of 2.99%, 1% annual growth in the Council Tax base, pay awards of 3.0% in 2026/27 reducing to 2.5% thereafter, and inflationary uplifts only where contractually required. The Plan also assumes a reset of the Business Rates Retention Scheme from 2026/27 with transitional support, the cessation of New Homes Bonus from 2026/27, and broadly stable planning fee income. However, uncertainty remains around future local government funding reforms, unconfirmed grant allocations and the introduction of food waste collection services from April 2026, where the level of New Burdens funding had not yet been confirmed.

The General Fund Budget is Nuneaton and Bedworth Borough Council's primary account for funding day-to-day public services, excluding council housing. Its budget-setting process focuses on aligning operational costs (such as parks, waste collection, and planning) with incoming revenue streams like Council Tax, Business Rates, and central government funding grants. For the 2025/26 financial year, this statutory process culminated at the Full Council meeting on 19 February 2025, where councillors ratified a General Fund Revenue Net Expenditure of £20.8m and a General Fund Capital Expenditure of £41.0m. The Council delivered a favourable General Fund outturn for 2025/26, generating a surplus of £0.464m compared to a budgeted surplus of £0.004m. The positive result was driven primarily by higher-than-expected Business Rates income of £1.7m, additional government grant funding, and the fact that £1.4m of planned earmarked reserve drawdowns were not required due to stronger investment income and lower borrowing costs. Whilst central provisions overspent by £1.3m, this was more than offset by portfolio underspends of £0.7m and the additional income received during the year. As a result, the Council strengthened its financial position, with earmarked reserves increasing at year end, demonstrating effective financial management and enhanced resilience against future financial pressures.

2025/26 HRA Budget and Medium-Term Financial Plan

The Council maintains a 30-year Housing Revenue Account Business Plan, which was refreshed for 2025/26 and is aligned with the Council's Housing Strategy (2024-2034) and wider corporate priorities. The Plan sets out how the Council intends to provide and maintain safe, warm and affordable homes while ensuring the long-term financial sustainability of the HRA. Key priorities include increasing the supply of council housing through new build, acquisition and conversion programmes, maintaining compliance with the Decent Homes Standard, improving energy efficiency, investing in tenant safety, and delivering services that respond to the changing needs of tenants and leaseholders. The Plan also recognises the increasing regulatory requirements placed on social landlords, including compliance with the Social Housing (Regulation) Act 2023, Tenant Satisfaction Measures, the Housing Ombudsman Complaint Handling Code and the forthcoming introduction of Awaab's Law.

The HRA is forecasting a balanced revenue position in 2025/26 and remains financially sustainable over the life of the Business Plan. The Council has assumed annual rent increases in line with Government policy, with rents increasing by 2.7% in 2025/26, while continuing to manage cost pressures arising from inflation, repairs and maintenance requirements and regulatory compliance. The Business Plan assumes that existing HRA debt of approximately £54.0m will be maintained and refinanced as it matures, rather than increasing borrowing to fund general capital expenditure. This approach is intended to support long-term affordability and financial resilience while enabling continued investment in the housing stock. The HRA also maintains healthy reserve balances, including approximately £2.5m in general balances and £5.1m in earmarked reserves, providing additional resilience against future financial pressures.

Value for money: financial sustainability

The Housing Revenue Account (HRA) achieved a favourable outturn for 2025/26, reporting a surplus of £0.4m against a budget that had been set on a break-even basis. The positive position was achieved despite increased expenditure on capital contributions, as this additional spending was more than offset by higher rental income and reduced management service costs during the year. The HRA also transferred balances into the Major Repairs Reserve, supporting future investment in the Council's housing stock. Overall, the outturn reflects appropriate financial management within the HRA, with income growth and expenditure control contributing to an improved financial position and enhanced capacity to fund future housing maintenance and capital requirements.

Capital Programme

The Council's capital programme covers many projects for both the General Fund and Housing Revenue Account. General Fund projects are developed in line with strategies reported to Cabinet/Council and are funded through Section 106 developer contributions, grant funding (from the Government and other external providers), internal and external borrowing plus capital receipts generated through asset sales. HRA projects are mainly for refurbishment of council houses, disabled adaptations to council housing plus new build. They are funded from HRA reserves, capital receipts from Right to Buy and grant income.

The Council approved the commencement of a large regeneration programme in Nuneaton and Bedworth towns in 2017 and significant levels of grant funding have been secured to support delivery. Unfortunately, the UK economic climate changed dramatically after the inception of projects which meant that a review of affordability had to be undertaken. While this delayed some projects, the Council has been able to complete Hampton hotel in September 2024, which is run by Hilton Hotel, this represents Grayson Place phase 1. The Bedworth Physical Activity Hub was also reviewed and cost engineered to a reduced budget of £30.6m. The Bedworth Physical Activity hub opened in March 2026. During the 2025/26 year, a proposed Capital Programme for £41m project was approved. Significant plan spending is on Abbey Street Regeneration, Disabled Facilities Grants in partnership with HEART and Bedworth Physical Activities Hub. For HRA £15.9m was approved, which included significant projects such as Fire Safety Works, New Properties, Decent Homes, Roof Coverings/Modifications and Voids.

The Council incurred £58.473m of capital expenditure during 2025/26, reflecting significant investment in both regeneration and housing priorities. The initial budget was set at £41.0m for the General Fund and £15.9m for the HRA, giving a total budget of £56.9m. This was subsequently revised to £55.2m for the General Fund and £18.1m for the HRA, resulting in a total revised budget of £73.3m. Actual expenditure was £10.8m lower than budget for general fund and £3.9m lower than the budget for HRA, resulting in an overall underspend of £14.8m. This was largely attributable to the underspend in regeneration projects (Grayson place), the underspent on Warm Homes Local Grant due to late confirmation of allocation and Vehicle Replacement where the council experience delays in delivery of the vehicles. The underspent on HRA was due to delay in construction, this has been roll-forward to 2026/27. The largest areas of spend included £14.127m on major repairs and the development of council housing, £12.301m on Nuneaton town centre regeneration, £17.031m on the Bedworth Physical Activity Hub, £8.516m on disabled adaptations through the HEART partnership, and £4.043m on decarbonisation and the refurbishment of Pingles Leisure Centre. Additional investment included £0.997m of energy efficiency grants, £0.308m improving parks and open spaces including Bedworth Market refurbishment, and £0.574m on major repairs to assets and cemeteries, with further expenditure on smaller projects across the borough. The scale of capital investment demonstrates the Council's continued commitment to improving housing, supporting economic regeneration, enhancing community facilities and infrastructure, and delivering environmental improvements for residents.

Value for money: financial sustainability

Transformation programme

The Council has continued to strengthen its financial planning arrangements through medium-term financial planning, transformation activity, and alignment with corporate priorities. The Corporate Plan includes commitments to forward financial planning, the delivery of sustainable budgets, and the modernisation of services. An appointment to the Assistant Director of Digital and Business Change role was made in December 2025 to lead the Council's transformation agenda. This was followed by the development and Cabinet approval of a new Transformation Strategy on 27 May 2026. The strategy provides a structured framework for organisational change and identifies key challenges facing the Council, including ongoing financial pressures, increasing resident expectations, the need to improve efficiency and productivity, uncertainty arising from Local Government Reorganisation (LGR), and the growing importance of digital technology and data-driven decision-making. It also establishes a more coordinated approach to transformation through strengthened project governance, improved workforce capability, and better alignment of resources with strategic priorities. The Council has not currently identified any funding gap under the existing funding settlement. However, future financial sustainability will depend on the outcome of the next multi-year funding settlement, which is expected to commence in 2027/28.

Value for money: financial sustainability

Financial ratios

	Council's ratios	Expectation	Evaluation
MRP as % of total borrowing	5.3%	< 3% then this may indicate a higher risk of MRP being insufficient to secure longer term financial resilience	
MRP as % of Capital Financing Requirement (CFR)	2.7%	< 2% then this may indicate a higher risk of MRP being insufficient to secure longer term financial resilience	
Debt as a proportion of CFR	76%	>100% then this may indicate a higher risk of the Council being over-indebted	
Total general fund and earmarked reserves as a proportion of net cost of services	79%	the lower the proportion, the greater the risk to financial resilience	
General fund and earmarked reserves as a percentage of net service revenue expenditure	82%	the lower the percentage, the greater the risk to financial resilience	
Long term borrowing as a proportion of long term assets	18%	the higher the proportion, the greater the risk the council is over indebted	

Source: Nuneaton and Bedworth Borough Council draft published 2025/26 financial statements

The Council's financial ratio analysis indicates a strong and resilient financial position, with all reported indicators assessed as presenting a low level of risk. This assessment is based on draft, unaudited financial information. Debt as a proportion of the Capital Financing Requirement (CFR) was 76%, demonstrating that borrowing remains below the Council's underlying need to borrow, whilst long-term borrowing represented only 18% of long-term assets, indicating prudent use of debt financing. In addition, the Council maintained substantial reserve levels, with general fund and earmarked reserves equivalent to 79% of the net cost of services and 79% of net service revenue expenditure, providing a significant financial buffer to support future financial sustainability and mitigate financial pressures. Using the draft accounts and workings MRP represents 5.3% of total borrowing, above the 3% benchmark, and 2.7% of the Capital Financing Requirement (CFR), above the 2% benchmark. While the absolute level of MRP may appear relatively low, this reflects the nature and age profile of the Council's capital assets. Borrowing associated with newer assets typically results in a lower initial MRP charge, with provision increasing over time as assets age and the underlying CFR is reduced. We also note that borrowing represents only 18% of the Council's capital assets, indicating that a significant proportion of the asset base has been financed through internal resources rather than external borrowing. This reduces the Council's exposure to external financing costs and refinancing risks, which supports overall financial resilience.

Value for money: financial sustainability

Minimum Revenue Provision

Guidance issued by the Secretary of State under section 21(1A) of the Local Government Act 2003 requires the Council each year to set a Minimum Revenue Provision (MRP). The MRP refers to the amount charged to the revenue budget for the repayment of debt, based on the underlying need to borrow rather than the actual debt held. This underlying debt is necessary to finance the capital expenditure programme.

Capital expenditure generally relates to assets with a life expectancy of more than one year, such as buildings, vehicles, and equipment. It is therefore prudent to charge an amount for the repayment of debt over the life of the asset, or a similar proxy, allowing borrowing to be matched to asset life. Setting aside funds for debt repayment in this way enables future borrowing to finance asset replacement without incurring additional cost. The method of spreading these costs is through an annual Minimum Revenue Provision, and it is therefore important that the MRP is sufficiently prudent to mitigate long-term financial sustainability risks. A prudent MRP policy ensures that the Council sets aside adequate resources to repay borrowing over time, thereby reducing future financial pressure.

Indicators of prudence can be assessed by comparing the MRP to the Council's Capital Financing Requirement (CFR) and total borrowings, and by comparing total borrowings to the CFR. An MRP level below 2% of the CFR and 3% of total borrowings may indicate increased financial risk. Where total borrowings exceed the CFR, this also indicates reduced financial headroom. Based on the Council's draft unaudited 2025/26 financial statements, the Minimum Revenue Provision (MRP) for 2025/26 was £484k, representing 2.7% of the CFR (excluding CFR for HRA) and 5.3% of total borrowings (excluding HRA borrowings), which is above the benchmark of 2% and would indicate reasonable financial resilience for the Council.

Summary

We have not identified any significant weaknesses in the arrangements in place to support financial sustainability.

We have closed one 'other' recommendation relating to refining existing arrangements for identifying and monitoring MTFP savings plans to ensure that planned savings are fully delivered. This recommendation was originally raised due to the identified need for savings to address a potential funding gap arising from the provisional Fair Funding Review. Following receipt of the final funding settlement, the Council has not identified a budget gap requiring savings to be delivered and, therefore, this recommendation has been closed.

Value for money: governance

This relates to the arrangements in place for overseeing the Council's performance, identifying risks to achievement of its objectives and taking key decisions.

We considered the following areas:

- how the Council monitors and assesses risk and gains assurance over the effective operation of internal controls, including arrangements to prevent and detect fraud;
- how the Council approaches and carries out its annual budget setting process;
- how the Council ensures effective processes and systems are in place to ensure budgetary control; to communicate relevant, accurate and timely management information (including non-financial information where appropriate); supports its statutory financial reporting requirements; and ensures corrective action is taken where needed, including in relation to significant partnerships;
- how the Council ensures it makes properly informed decisions, supported by appropriate evidence and allowing for challenge and transparency. This includes arrangements for effective challenge from those charged with governance/audit committee; and
- how the Council monitors and ensures appropriate standards, such as meeting legislative/regulatory requirements and standards in terms of officer or member behaviour (such as gifts and hospitality or declarations/conflicts of interests) and for example where it procures or commissions services.

Governance and Risk Management

Nuneaton and Bedworth Borough Council (NBBC) manages risk through a structured corporate governance and risk management framework that is aligned with the CIPFA/SOLACE principles of good governance. This framework is set out in the Council's Local Code of Corporate Governance, which was last updated in February 2026 and is reviewed every three years. In addition, the Council undertakes an annual review of its governance arrangements to assess whether they remain adequate and are operating effectively, or to identify actions required to strengthen governance in the future. The outcome of this review is reported through the Annual Governance Statement, which is prepared on behalf of the Leader and Chief Executive, reviewed by the Audit and Standards Committee, and published alongside the Council's Statutory Statement of Accounts in accordance with the Accounts and Audit Regulations. The framework promotes accountability, transparency, effective decision-making and community engagement by ensuring that the Council delivers services in an open, inclusive and responsible manner. Independent assurance over the adequacy and effectiveness of these governance arrangements is provided by the Audit and Standards Committee through its annual review of the Annual Governance Statement.

Nuneaton and Bedworth Borough Council (NBBC) manages risk and performance through a system of internal control and public financial management arrangements, as set out within its governance framework and Risk Management Policy and Strategy. The Council recognises that effective risk management is an integral part of all activities and decision-making processes, ensuring that risks are identified, assessed and managed in a consistent manner across the organisation. Responsibilities for managing individual risks are clearly assigned, with oversight provided through the Strategic Risk Register, Operational Risk Registers, Corporate Governance Group, Corporate Executive Team, Senior Leadership Team, Audit and Standards Committee, and both Internal and External Auditors. The Council's approach to risk management is further embedded within Part 5 of the Constitution, which details the Risk Management Policy and Strategy. Through these arrangements, NBBC seeks to effectively manage both internal and external risks, support business continuity, safeguard resources, and maximise opportunities to achieve its corporate priorities and long-term vision.

Value for money: governance

Internal Auditors

The Council is a full member of the Central Midlands Audit Partnership (CMAP), a hosted internal audit service managed by Derby City Council, which provides independent assurance over governance, risk management, internal control and counter-fraud arrangements. The 2025/26 Internal Audit Plan was developed by CMAP in consultation with the Council's Leadership Team and presented to the Audit and Standards Committee on 1 April 2025. The plan sets out how internal audit resources will be allocated throughout the year and includes sufficient audit coverage to enable the Chief Audit Executive (Audit Manager) to provide an annual opinion on the effectiveness of the Council's governance, risk management and control framework. The programme comprised twelve planned audits during 2025/26, alongside follow-up reviews of recommendations raised in previous years. Progress against the Internal Audit Plan was monitored throughout the year and reported regularly to the Audit and Standards Committee, including updates in September 2025, November 2025 and March 2026.

Eleven of the 20 audits have been completed, while the remaining audits are nearing completion. This reflects the 2024/25 roll-forward audit plan, following delays to the internal audit plan in 2024/25, together with the planned audits for 2025/26. Of the 11 completed audits, eight received Reasonable Assurance, one received Substantial Assurance, and two received Limited Assurance. The Limited Assurance opinions related to the Corporate Fire Risk Management Review and Fuel Cards audits. Importantly, neither review resulted in a No Assurance opinion. Instead, both identified areas where controls require strengthening, with improvement actions recommended to address the control deficiencies and enhance the effectiveness of the control environment.

Internal Audit annual report shows that 70 recommendations were raised during 2025/26. Of these, 38 recommendations (54%) had been closed and implemented, while 32 recommendations remained open at the time of reporting. The open recommendations comprised 20 future actions, 10 delayed future actions, 2 delayed action due items, and no recommendations categorised simply as action due. The majority of open recommendations relate to moderate and low-risk findings, with no critical or significant-risk recommendations outstanding. Internal Audit noted that management has demonstrated a commitment to addressing the identified control weaknesses, although progress in implementing some actions has been slower than planned, particularly in areas such as corporate fire risk management, licensing, food hygiene and credit card governance. The number of open recommendations has reduced from 94 to 32 when compared to previous year, with 38 recommendations closed and implemented, and no outstanding recommendations assessed as critical or significant risk. The remaining open recommendations are subject to agreed management actions and ongoing monitoring by Internal Audit. The substantial reduction in outstanding recommendations, the absence of high-risk overdue actions, and evidence that management has strengthened the process for monitoring, provides an assurance that management are promptly addressing the internal audit recommendation.

The Internal Audit Annual Opinion was presented to the Committee in June 2026 and provided reasonable assurance that the Council's framework of governance, risk management and internal control was generally adequate and effective in supporting the delivery of its objectives. The opinion also identified areas where controls could be strengthened, particularly in relation to corporate fire risk management, and management agreed action plans to address the issues identified and further enhance the control environment.

Value for money: governance

Counter Fraud Arrangements

The Council maintains arrangements for the prevention and detection of fraud through a dedicated Corporate Fraud Investigations function. Counter-fraud activity is reported to Members through the Audit and Standards Committee and includes proactive investigation of suspected fraud, supported by an accredited fraud specialist from the CMAP contract arrangement. As part of our fraud risk assessment procedures, we made enquiries of senior officers including; the Chief Executive, monitoring officer, s151 officer and Internal Audit regarding their knowledge of any actual, suspected or alleged fraud affecting the Council. All parties confirmed that they were not aware of any actual, suspected or alleged frauds, other than routine housing benefit fraud matters which are not material to the financial statements. We also enquired about instances of non-compliance with laws and regulations and any significant legal matters with senior officers, no matters were raised to our attention that would indicate a heightened risk of fraud or material misstatement. Based on the enquiries undertaken and the audit procedures performed to date, we have not identified any significant fraud, nor have we identified any matters that would indicate a material misstatement in the financial statements arising from fraud.

Policies Procedure including Governance Arrangement for Contract & Procurement

The Council has established a governance framework through its Constitution, Financial Procedure Rules, Contract Procedure Rules, Performance Management Framework, Anti-Fraud, Corruption and Bribery Strategy, Anti-Money Laundering Framework, Codes of Conduct, Whistleblowing arrangements and Member/Officer protocols. These policies are designed to ensure decisions are made lawfully, transparently, ethically and in accordance with the Council's objectives. Oversight is provided through the Audit and Standards Committee, Cabinet, Overview and Scrutiny Panels, statutory officers and Internal Audit, creating multiple layers of accountability and challenge.

The Council has formal procurement and contract management procedures to ensure goods, services and works are commissioned fairly and transparently. Procurement activity must follow the Contract Procedure Rules, comply with the Procurement Act 2023, demonstrate value for money, consider social value outcomes and be supported by appropriate approvals, competition and contract monitoring arrangements. Contract performance is managed through nominated contract officers and performance indicators.

Annual Budget process and financial reporting

The annual budget process for Nuneaton and Bedworth Borough Council follows a structured cycle that begins in the autumn with forecasting and identifying the medium-term financial gap. During January and February, the council opens a public consultation to gather feedback from residents and local businesses on proposed spending priorities and council tax adjustments. Following scrutiny by the Cabinet and specific committees, the draft budgets, spanning the General Fund and the Housing Revenue Account for both revenue and capital spending, are presented to the Full Council. The process takes place in late February at a formal meeting where councillors vote to ratify the final budget and set the Council Tax rates for the upcoming financial year, which runs from 1 April to 31 March.

The 2025/26 Statement of Accounts was prepared and published by the statutory deadline of 30 June 2026. As in the previous year, the accounts were published ahead of the deadline, demonstrating a sustained improvement in the Council's financial reporting and closedown arrangements. This achievement is particularly noteworthy as the 2025/26 accounts included the preparation of group accounts for the first time, introducing additional complexity to the year-end closedown and financial reporting process.

Value for money: governance

Annual Budget process and financial reporting (continue)

In addition, management has strengthened the finance function through recruitment during 2026/27, and we have observed greater involvement from a wider range of finance officers in responding to audit requests, rather than relying solely on the main points of contact. Further to this, the Council had received a disclaimer opinion for number of years, which requires completion of the necessary build-back procedures and a full audit in 2026/27 as part of the plan to remove the disclaimer opinion. This will require a significant commitment of time and resources to ensure that the finance team has sufficient capacity to support the full audit process while also completing any remaining build-back work required to address the causes of the disclaimer. The Council has continued to engage proactively in the build-back process, including accommodating audit work outside the normal audit cycle during August and September 2026. The progress made to date, together with investment in additional finance capacity, timely publication of the accounts, and ongoing engagement with auditors, demonstrates an improvement trajectory in the Council's financial reporting arrangements. Given the progress made, including investment in additional finance staff, engagement with auditors to undertake build-back work during August and September, and the timely publication of the accounts, the Council has demonstrated improvement in its financial reporting arrangements. These actions have strengthened the capacity and resilience of the finance function and provide a stronger platform for completing the build-back programme. While the sustainability of these improvements will only be evidenced over time, the progress achieved to date indicates that the Council is in a stronger position to support the successful removal of the disclaimer opinion in future years. Given the progress made during the year, we have not identified a significant weakness in this area. Management should however continue to implement improvements and ensure there is sustainable capacity within the finance team to accommodate the additional procedures and testing required to rebuild assurance in future years.

Local Government Reorganisation

On 16 July 2026, the Government announced its preferred approach to Local Government Reorganisation (LGR) in Warwickshire, proposing the establishment of two unitary authorities. Following consultation, the Ministry of Housing, Communities and Local Government confirmed its intention, subject to Parliamentary approval, to implement a two-unitary model, with one authority covering North Warwickshire, Nuneaton and Bedworth, and Rugby, and a second covering Stratford-on-Avon and Warwick. In September 2026, councils were advised that the proposals would be subject to further review and implementation activity was paused pending the outcome of that review.

On 29 October 2026, the Government announced the outcome of its review and confirmed that Warwickshire is one of five areas where Ministers are minded to proceed with local government reorganisation. A further period for representations will take place before final decisions are made. The Government has indicated that local elections will continue in May 2027 on existing boundaries, with elections to shadow authorities expected in May 2028 and new unitary councils established in 2029. Whilst there remains some uncertainty until final decisions are confirmed, the Council has continued to operate through its normal governance and financial management arrangements. Significant spending decisions have not been deferred because of LGR, procurement commitments continue to be assessed through established processes, and the Council's budget-setting and Medium-Term Financial Plan arrangements remain in place to support financial planning during the transition period.

Value for money: governance

Local Government Reorganisation (continued)

The Government has indicated that it is minded to proceed with the two-unitary proposal for Warwickshire submitted by Nuneaton & Bedworth Borough Council and partner authorities. While final decisions are still subject to consultation and ministerial approval, the announcement provides greater clarity regarding the future structure of local government in the area. A lot of work has already been done, the leadership team from North Warwickshire, Nuneaton and Bedworth, and Rugby have been in communication through the phases of the reorganisation. The engagement is aimed to ensure priority is to protect the services residents, businesses and communities.

Section 5 Notice

A Section 5 Notice is a formal report issued by the Monitoring Officer under the Local Government and Housing Act 1989 where there is evidence, or a risk, that the Council has acted unlawfully or failed to comply with a statutory requirement. The notice requires the matter to be reported to members and can result in the suspension of the relevant decision or action until the Council has considered the findings and determined an appropriate response.

The Council issued a Section 5 Notice after the Monitoring Officer concluded that the introduction of the Empty Homes and Second Homes Council Tax Premiums had not followed the required statutory and governance processes. Although Cabinet approved the premiums in October 2024, they were not formally determined by Full Council, the Council did not reconsider its position following the publication of new statutory guidance in November 2024, and there was insufficient evidence that the associated policy had been formally approved. Following legal advice, the Council accepted that the required process had not been correctly followed. The issue was not that the premiums themselves were unlawful, but that the Council had failed to follow the appropriate decision-making and governance requirements when introducing them. As a result, the Council withdrew the premiums, refunded affected taxpayers and recommenced the process in accordance with the relevant legal and constitutional requirements.

The financial impact fell primarily on the Collection Fund rather than the General Fund. While the Second Homes Premium had not yet been implemented and therefore required no refunds, Empty Homes Premium charges of approximately £259k were refundable. The worst-case overall impact was estimated at £474k, reducing the forecast Collection Fund surplus by £270k. The Council confirmed that no interest would be payable on refunds and that the General Fund would not be directly affected. Although the financial impact was assessed as immaterial, the Council did not ensure that appropriate governance and decision-making processes were followed, resulting in non-compliance with legal requirements. Accordingly, we have raised a recommendation. The Council should strengthen arrangements to ensure that all decisions requiring member approval are subject to appropriate legal and governance review before implementation, including consideration of new statutory guidance.

Regulator of Social Housing Consumer Inspection

An inspection was completed in September 2026 by regulator of Social Housing. The inspection assessed the Council's compliance with the Consumer Standards, including safety, housing quality, tenant engagement, accountability and tenancy management, and forms part of the regulator's programme of proactive inspections introduced from April 2024.

Value for money: governance

Regulator of Social Housing Consumer Inspection (continued)

The inspection resulted in a C3 judgement, reflecting serious failings in the Council's delivery of the Safety and Quality Standard and aspects of the Transparency, Influence and Accountability Standard. Key findings included gas safety compliance falling to 80%, over 1,600 overdue fire safety remedial actions, over 1,000 overdue water safety remedial actions, weaknesses in repairs performance and reporting, limitations in housing stock and asset data, and shortcomings in complaints handling and regulatory reporting.

The findings also highlighted weaknesses in internal control, performance monitoring and assurance arrangements, including limited performance reporting, out-of-date policies, systems that were not fit for purpose in some areas, and failures to communicate material issues to the regulator in a timely manner. These weaknesses contributed to the regulator's conclusion that significant improvement is required.

We have therefore identified a significant weakness in the Council's arrangements for governance, oversight and compliance within its landlord services. While the Regulator of Social Housing's Consumer Standards inspection was completed after the period under review, the nature and scale of the findings indicate that the underlying weaknesses had developed over an extended period and were therefore relevant to the Council's arrangements during 2025/26. The Council's arrangements did not ensure effective monitoring and oversight of key health and safety compliance obligations, nor did they provide sufficiently robust performance, assurance and reporting arrangements to identify and address emerging issues in a timely manner. Accordingly, we have raised a key recommendation that the Council implements and monitors its housing improvement programme to ensure compliance with the Consumer Standards, with a particular focus on strengthening health and safety compliance, repairs services, data quality, performance monitoring and governance oversight. The Council should also ensure that accurate and timely management information is available to support decision-making, monitor operational performance, track statutory compliance obligations, and enable the prompt escalation and reporting of material issues to senior management, Members and the Regulator of Social Housing.

Value for money: governance

Summary

We have identified one new significant weakness in the Council's arrangements for governance, oversight and compliance within its landlord services.
The prior year significant weakness in relation to how the Council ensures effective processes and systems are in place to support its statutory financial reporting requirements is no longer considered significant and has therefore been removed. However, we have added an “other” recommendation until the Council has demonstrated that the improvements made are fully embedded and supported by sustainable finance capacity and organisational resilience.

We have raised one key recommendation in relation to Regulator of Social Housing Consumer Inspection. The Regulator of Social Housing identified serious failings in the Council's compliance with the Consumer Standards, including weaknesses in health and safety compliance, repairs services, data quality, performance reporting and governance oversight. The Council should look to implement and monitor its housing improvement programme to address the issues identified by the regulator, ensure compliance with the Consumer Standards, and strengthen governance, compliance and operational arrangements. The Council should also ensure that accurate and timely management information is available to support decision-making, monitor operational performance, track statutory compliance obligations, and enable the prompt escalation and reporting of material issues to senior management, Members and the Regulator of Social Housing.

We have closed the prior year other recommendation in respect of Internal Audit's implementation of recommendations, due to substantial reduction in outstanding recommendations, the absence of high-risk overdue actions, and evidence that management has strengthened the process demonstrate that controls in this area have improved.

We have raised an “other” recommendation. The Council should strengthen arrangements to ensure that all decisions requiring member approval are subject to appropriate legal and governance review before implementation, including consideration of new statutory guidance.

Value for money: improving economy, efficiency and effectiveness

This relates to how the Council seeks to improve its systems so that it can deliver more for the resources that are available to it.

We considered the following areas:

- how financial and performance information has been used to assess performance and identify areas for improvement;
- how the Council evaluates service quality to assess performance and identify areas for improvement;
- how the Council ensures it delivers its role within significant partnerships and engages with stakeholders it has identified, to assess whether it is meeting its objectives; and
- where the Council commissions or procures services, how it assesses whether it is realising the expected benefits.

Performance and governance arrangements

The Council has established a governance, performance and accountability framework through its four Overview and Scrutiny Panels. These panels provide independent member challenge and oversight across key service areas, scrutinising performance, reviewing policy implementation, monitoring strategic risks, and holding decision-makers to account. Performance and financial oversight is supported through quarterly Integrated Performance Reports and integrated finance and performance monitoring reports, which provide members with information on service performance, financial and non-financial indicators, strategic risks, complaints, information governance metrics, and other key performance measures relevant to their remit. These reports are considered by the Management Team, Cabinet and the relevant Scrutiny Panels, enabling members to assess performance against targets, understand significant variances and emerging risks, challenge service delivery, and agree corrective or mitigating actions where necessary.

To assess the performance of its housing services against comparator organisations, the Council uses Housemark benchmarking for its HRA service. Housemark enables the Council to compare key housing performance indicators, including void turnaround times, repairs performance, and tenant satisfaction measures, with those of sector peers. The results are reported to management and used to identify opportunities for service improvement, supporting informed decision-making and continuous improvement across the housing service.

The Council also uses LG Futures to benchmark its financial performance and efficiency against peer authorities. The review identified opportunities to strengthen financial sustainability and improve operational efficiency. Management subsequently developed action plans to address the findings, with delivery monitored through established governance arrangements.

Corporate Plan

The Council has developed a Corporate Plan for 2025 to 2029, which aligns with and covers the period of the Medium-Term Financial Plan. The Plan reflects the Council's ambitions for residents and businesses across the borough and provides a clear strategic framework for service delivery and investment. A key focus is the physical transformation and regeneration of local urban centres through initiatives such as the Transforming Nuneaton Programme and the Bedworth Town Centre Regeneration Strategy. The Council maintains oversight of its significant programmes and projects through established governance arrangements, including regular project review meetings, performance monitoring, and reporting mechanisms for major developments.

Value for money: improving economy, efficiency and effectiveness

Corporate Plan (continue)

During the year, the Council continued to progress a number of key capital and regeneration projects, including the Nuneaton town centre regeneration programme, the Bedworth Physical Activity Hub, the refresh of Pingles Leisure Centre, and the development of new council housing. Although Local Government Reorganisation (LGR) has required significant officer and Member involvement, the Council has continued to deliver its strategic priorities and maintain momentum across major projects, service delivery, and planned improvements. This demonstrates a continued commitment to balancing day-to-day operational responsibilities with the achievement of longer-term strategic and transformational objectives.

Partnership

The Council's partnership landscape comprises a range of strategic collaborations with local authorities, emergency services, health partners, and community organisations to support economic growth, community safety, and service improvement. Key initiatives include the Transforming Nuneaton programme, delivered in partnership with Warwickshire County Council, which is driving significant town centre regeneration through projects such as Grayson Place. The Council also works closely with Warwickshire Police, the NHS, and other agencies through the Nuneaton and Bedworth Safer Communities Partnership (NABSCOP) to address crime, anti-social behaviour, and broader community safety issues. In addition, the Council is actively engaged with neighbouring authorities on proposals for local government reorganisation, including the Warwickshire Unitary Proposal, which aims to create a single northern unitary authority covering North Warwickshire, Nuneaton and Bedworth, and Rugby to improve service delivery and achieve operational efficiencies.

The Council also participates in a number of county-wide partnerships that support the delivery of key services. For example, it acts as the lead authority for the HEART Partnership, which serves all districts and boroughs across Warwickshire. Governance arrangements are well established, with quarterly reporting to the partnership board covering financial performance, budget monitoring for both revenue and capital expenditure, operational delivery, and progress against agreed objectives and performance targets. This provides oversight and accountability for partnership activities and outcomes.

Group Arrangements

The Council has established a group structure through its wholly owned subsidiary companies, Nuneaton and Bedworth Community Enterprises Limited (NABCEL) and Grayson Place (NBBC) Limited, which operate as separate legal entities with their own boards of directors and statutory responsibilities. The Council maintains oversight through its role as sole shareholder, exercised via the Shareholder Committee, which is responsible for monitoring company performance, reviewing business plans, scrutinising strategic and operational matters, and exercising shareholder rights where necessary. During 2026, NABCEL appointed a new Managing Director, to lead the company's next phase of development and commercial growth. The Managing Director is responsible for the overall strategic direction, financial performance and operational management of NABCEL, including identifying new business opportunities, strengthening commercial income streams and ensuring the company delivers value to both its customers and its sole shareholder, the Council. The governance framework is designed to balance commercial independence with accountability to the Council. Governance arrangements have also been reviewed to strengthen the distinction between the Council's shareholder role and the fiduciary responsibilities of company directors, reducing potential conflicts of interest and promoting corporate governance. Grayson Place Ltd is the Hilton, and the direction is set by them in accompaniment with Legacy who are a company the Council have employed to support as they have experience in hotel management.

Value for money: improving economy, efficiency and effectiveness

Procurement

The Council commissions and procures a wide range of goods, services and works to support the delivery of both statutory and discretionary services. The Council also makes use of framework agreements, collaborative procurement arrangements and e-procurement systems to access specialist goods and services where these provide value for money and operational benefits. The Council has established several mechanisms to ensure procurement activity is undertaken in accordance with relevant legislation, professional standards and internal policies.

The Procurement and Accounts Payable Strategy identifies compliance as a core strategic theme and requires procurement activity to comply with applicable procurement legislation, including the UK Public Procurement regime, the Procurement Act 2023, and the Council's own Contract Procedure Rules.

The Procurement and Accounts Payable Team is responsible for reviewing procurement practices, maintaining professional procurement expertise, providing advice and guidance to officers, supporting governance arrangements and mitigating the risk of legal challenge or non-compliance. Procurement opportunities are advertised through recognised procurement portals such as Sell2Midlands, Contracts Finder and Find a Tender, helping to ensure transparency, competition and compliance with public procurement requirements. The Council also seeks to realise wider benefits through collaboration with other local authorities, aggregation of spend, supplier rationalisation, support for SMEs and the delivery of social value outcomes such as local employment opportunities, skills development and prompt payment performance.

Summary

We have not identified any significant weaknesses in the Council’s arrangements.

Value for money: significant weaknesses and key recommendations

The significant weaknesses we have identified and the key recommendations made are set out below. Our detailed commentary is set out in this Auditor's Annual Report.

Significant weakness identified	Criteria	Sub criteria	Key recommendation	Management Response
Area How the body ensures it makes informed decisions and properly manages risk	Governance	How the body monitors and ensures appropriate standards, such as meeting legislative/regulatory requirements	The Regulator of Social Housing identified serious failings in the Council's compliance with the Consumer Standards, including weaknesses in health and safety compliance, repairs services, data quality, performance reporting and governance oversight. The Council should look to implement and monitor its housing improvement programme to address the issues identified by the regulator, ensure compliance with the Consumer Standards, and strengthen governance, compliance and operational arrangements. The Council should also ensure that accurate and timely management information is available to support decision-making, monitor operational performance, track statutory compliance obligations, and enable the prompt escalation and reporting of material issues to senior management, Members and the Regulator of Social Housing.	**Response**: Management agree. Housing Improvement Board has been established which includes s151 and MO and reviews the transformation workstreams specific to the regulatory judgement. Quarterly updates are to be presented to Statutory Officer Group, and the Housing Assistant Directors meet with the Regulator monthly submitting evidence of progress on the improvement plan. Updates will be presented to Cabinet as required with regular meetings in place with the Portfolio Holder. **Responsible Officer**: Dawn Dawson (Director of Housing, Communities & Economic Development) **Implementation Due Date**: Ongoing

Value for money: other recommendations

The other recommendations made are set out below. Our detailed commentary is set out in this Auditor's Annual Report.

Significant weakness identified	Criteria	Sub criteria	Key recommendation	Management Response
Area How the body ensures it makes informed decisions and properly manages risk	Governance	How the body ensures effective processes and systems are in place support its statutory financial reporting requirements	We have noted positive improvement on the Council producing and publishing draft accounts within the statutory deadline for 2025/26 and recruitment to increase finance capacity during August 2026. Management should continue to ensure that improvements to the financial reporting process are fully embedded and supported by sustainable finance capacity, with appropriate knowledge transfer, and resilience arrangements to reduce reliance on key individual officers to continue to enable rebuilding of audit assurance to move to a clean audit opinion in future years.	**Response**: Management agree. Positive progress has been seen, and a recent restructure has been undertaken to further strengthen the resilience of the team. **Responsible Officer**: Victoria Summerfield (Deputy Chief Executive & S151 Officer Strategic Director – Resources) **Implementation Due Date**: Ongoing

Value for money: other recommendations

Significant weakness identified	Criteria	Sub criteria	Key recommendation	Management Response	Outcome
Area How the body ensures it makes informed decisions and properly manages risk	Governance	How the body monitors and ensures appropriate standards, such as meeting legislative/regulatory requirements	The Council issued a Section 5 Notice after identifying that the Empty Homes and Second Homes Council Tax Premiums had not been implemented through the required statutory and governance processes, resulting in the withdrawal of the premiums, taxpayer refunds, and a revised decision-making process. Although the financial impact was assessed as immaterial, the Council did not ensure that appropriate governance and decision-making processes were followed, resulting in non-compliance with legal requirements. Accordingly, we have raised a recommendation. The Council should strengthen arrangements to ensure that all decisions requiring member approval are subject to appropriate legal and governance review before implementation, including consideration of new statutory guidance.	**Response**: Management agree. Cabinet report templates have been updated to include reference to Council Tax related matters plus all reports are reviewed in full by S151, CEO and MO prior to submission to Cabinet. **Responsible Officer**: Victoria Summerfield (Deputy Chief Executive & S151 Officer Strategic Director – Resources), Matt Wallbank (Monitoring Office) and Tom Shardlow (Chief Executive). **Implementation Due Date**: Already implemented	**Action completed. Recommendation closed.**

Value for money: follow up of prior recommendations

The recommendations we made in previous years are set out below, together with actions taken by the Authority in 2025/26 to address them. Our detailed commentary is set out in this Auditor's Annual Report.

Observation previously reported	Criteria	Recommendation previously made	Auditor update 2025/26	Outcome
Area How the body ensures it makes informed decisions and properly manages risk	Governance	The Council should look to ensure open audit recommendations are addressed and resolved in a more timely manner.	We have closed the other recommendation in respect of Internal Audit's implementation of recommendations, due to substantial reduction in outstanding recommendations, the absence of high-risk overdue actions, and evidence that management has strengthened the process demonstrate that controls in this area have improved.	Action completed. Recommendation closed.
Area How the body ensures it makes informed decisions and properly manages risk	Governance	The Council must ensure that their internal audit function has the appropriate skill mix and capacity to deliver the full approved IA Audit Plan.	The Council has used the CMAP to perform and oversees the audit service including producing a Head of internal Audit Report. Substantial Audit Plan has been completed, and significant amount of recommendations have been closed.	Action completed. Recommendation closed.
Area How the body plans and manages its resources to ensure it can continue to deliver its services	Financial sustainability	Refine existing arrangements for identifying and monitoring MTFP saving plans to ensure planned savings are fully delivered. Where circumstances change to affect delivery, these are clearly reported, especially for those in relation to early intervention and demand management	This recommendation was originally raised due to the identified need for savings to address a potential funding gap arising from the provisional Fair Funding Review. Following receipt of the final funding settlement, the Council has not identified a budget gap requiring savings to be delivered and, therefore, this recommendation has been closed.	Action completed. Recommendation closed.



Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 7

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Audit and Standards Committee
Date of Meeting:	1st December 2026
Subject:	Internal Audit Progress Report
Portfolio:	Not Applicable
Responsible Officer:	Audit Manager
Corporate Plan – Theme:	Your Council
Corporate Plan – Aim:	Strive for transparency and accountability, in all that we do. Increase public scrutiny
Ward Relevance:	All
Public or Private:	Public

Amendment to Budget: No Council Tax Related: No

Recommendation to Council/Cabinet/Committee: No

Forward Plan:	Not applicable (not for Cabinet)
Subject to Call-in:	Not applicable (not for Cabinet)

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1. Purpose of report

1.1. To provide an update on progress against the approved Internal Audit Plan. This details the performance and activity of Internal Audit since the last Progress Report presented to this Committee.

2. Recommendations

2.1. That the report of the Audit Manager (Appendix 1) is considered, and any issues identified are subject to a follow-up report as appropriate

3. Background

3.1. The Audit & Standards Committee is responsible for:

- scrutinising the activity of the Internal Audit service,
- challenging the responses of management to recommended control improvement or lack of progress against agreed actions,
- supporting improvements in governance, risk management and internal controls.
- Ensuring Internal Audit remains independent, effective, and risk focused

4. Body of report and reason for recommendations

4.1. A report on the progress against the 2026/27 internal audit plan is attached at Appendix 1.

5. Consultation with the public, members, officers and associated stakeholders

5.1. None directly related to this report.

6. Financial Implications

6.1. None directly related to this report.

7. Legal Implications

7.1. None directly related to this report.

8. Equalities implications

8.1. None directly related to this report.

9. Health implications

9.1. None directly related to this report.

10. Climate and environmental implications

10.1. No direct climate and/or environmental implications have been identified.

11. Section 17 Crime and Disorder Implications

11.1. Not applicable to this report.

12. Risk management implications

12.1. This Internal Audit Progress Report provides assurance on the adequacy and effectiveness of the Council's governance, risk management and control arrangements. The findings and recommendations arising from completed audits highlight areas where controls can be strengthened to better manage identified risks. Implementation of agreed actions will support continuous improvement in the Council's overall risk management framework.

13. Human resources implications

13.1. No direct human resource implications have been identified.

14. Biodiversity Implications

14.1. No direct biodiversity implications have been identified.

15. Local Government Reorganisation (LGR) Implications

15.1. No direct LGR implications have been identified.

16. Options considered and reason for their rejection

16.1. Not applicable to this report.

17. Conclusion

17.1. This report demonstrates continued delivery of the approved Audit Plan and provides assurance that appropriate arrangements are in place to address identified risks and control weaknesses. The Audit & Standards Committee is invited to note the progress made, consider the outcomes of completed audits, and endorse the ongoing actions to strengthen the Council's governance, risk management and internal control environment.

18. Appendices

18.1. Please note the following appendix:

i. Appendix A – Internal Audit Progress Report

19. Background papers

19.1. Please note there are no background papers attached to this report.

20. Report Writer Details:

Officer Job Title: Audit Manager

Officer Name: Adrian Manifold

central midlands audit partnership

Nuneaton & Bedworth Borough Council – Audit Progress Report

Audit & Standards Committee: 1st December 2026



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Our Vision

To bring about improvements in the control, governance and risk management arrangements of our Partners by providing cost effective, high quality internal audit services.

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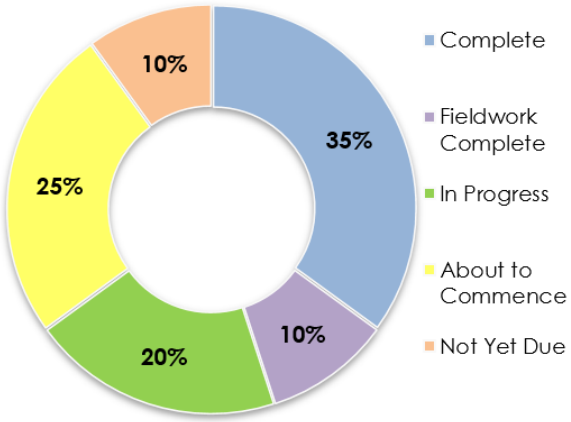
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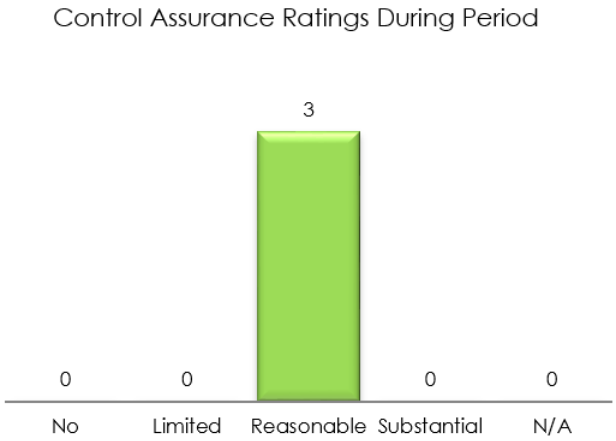
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AUDIT DASHBOARD

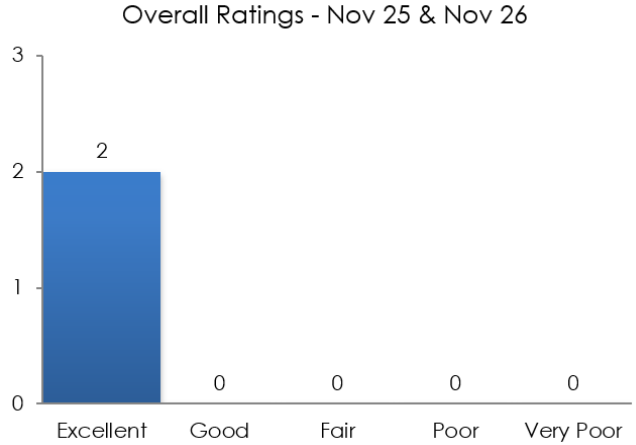
Plan Progress



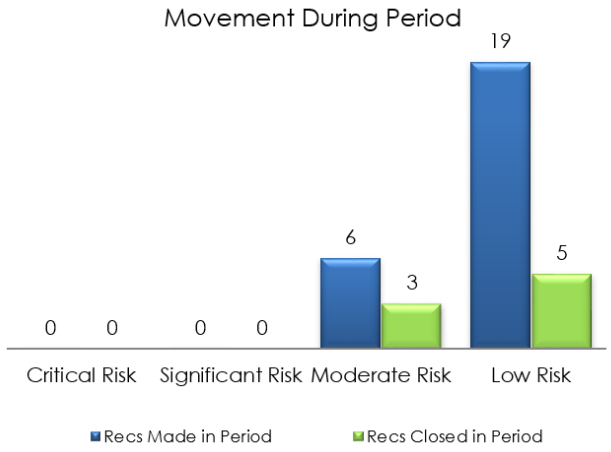
Jobs Completed in Period



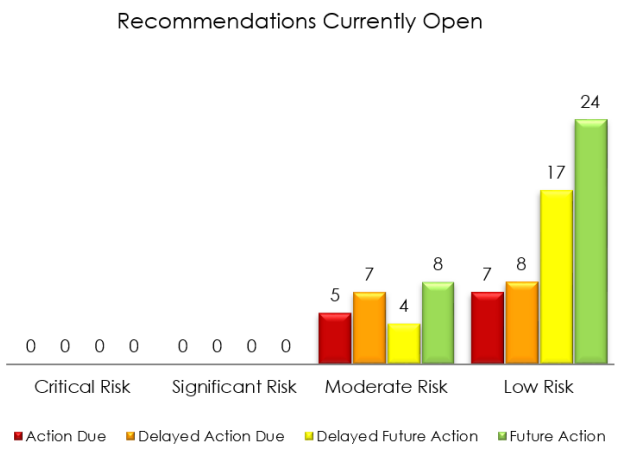
Customer Satisfaction



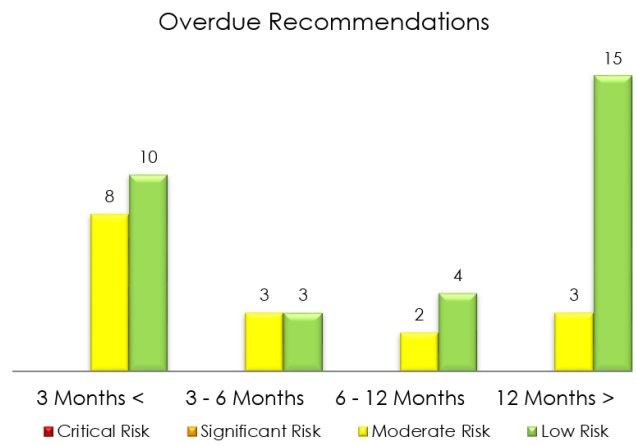
Recommendations Movement



Recommendations Open



Recommendations Overdue



Nuneaton & Bedworth Borough Council – Audit Progress Report

AUDIT PLAN

Progress on Audit Assignments

The following tables provide Audit & Standards Committee with information on how audit assignments were progressing as at 19th November 2026.

2025-26 Assignments	Status	% Complete	Assurance Rating
Cash Management	Not Allocated	0%	
Anti-Fraud & Corruption	In Progress	20%	
Customer Complaints	Allocated	5%	
IT Infrastructure/Applications 2026-27	Not Allocated	0%	
Emergency Planning	Allocated	40%	
Procurement (Contracts Register)	Allocated	10%	
Housing Regulation (Consumer Standards)	In Progress	5%	
Health & Safety	In Progress	50%	

B/Fwd Assignments	Status	% Complete	Assurance Rating
Insurance	Final Report	100%	Reasonable
Housing Benefit & Council Tax Support	In Progress	75%	
Information Security 2025-26	Final Report	100%	Reasonable
Markets & Street Trading	Fieldwork Complete	90%	
Corporate Fire Risk Management	Final Report	100%	Limited
Voids Management	Draft Report	95%	
Capital Project Management	Fieldwork Complete	90%	
Waste Management	Final Report	100%	Reasonable
Parks & Open Spaces	Allocated	10%	
Credit Cards	Final Report	100%	Reasonable
Housing Fire Risk Management	Final Report	100%	Reasonable
Fuel Cards	Final Report	100%	Limited

Plan Changes

None.

Nuneaton & Bedworth Borough Council – Audit Progress Report

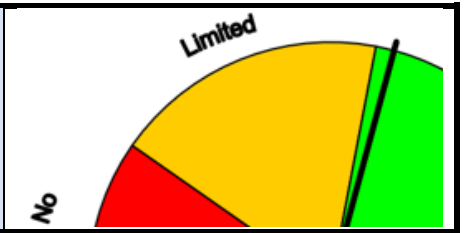
AUDIT COVERAGE

Completed Audit Assignments

Between 4th September 2026 and 19th November 2026, the following audit assignments have been finalised.

Audit Assignments Completed in Period	Assurance Rating	Recommendations Made				% Recs Closed
		Critical Risk	Significant Risk	Moderate Risk	Low Risk	
Insurance	Reasonable			3	6	11%
Housing Fire Risk Management	Reasonable			2	4	0%
Information Security 2025-26	Reasonable			1	9	10%

Insurance



Control Objectives Examined	Controls Evaluated	Adequate Controls	Partial Controls	Weak Controls
Adequate insurance cover is in place to cover known areas of insurable risk, legal and other contractual requirements	3	0	3	0
Insurance claims are promptly and adequately assessed, processed and dealt with to conclusion with summary information reported to management	4	1	3	0
Data relating to insurance policies and claims is appropriately stored and managed.	1	1	0	0
The insurance function is appropriately recognised throughout the Council and given sufficient priority to enable the Insurance Team to deliver their service effectively.	3	0	3	0
TOTALS	11	2	9	0

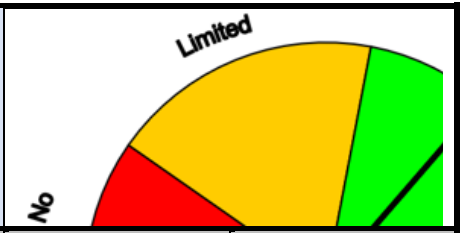
Rec No.	Summary of Weakness	Risk Rating	Original Action Date	Action Status	Revised Action Date
1	Insurance documentation was incomplete and not consistently maintained. While core policies were in place, records were fragmented, with some periods supported only by secondary	Moderate Risk	30/10/2026	Action Due	

Nuneaton & Bedworth Borough Council – Audit Progress Report

	evidence or missing documentation entirely, limiting transparency over the Council's full insurance position.				
2	The Council relied heavily on third parties and brokers for insurance assessments and recommendations, with limited evidence of its own review and challenge of insurance arrangements, risks, and asset valuations.	Moderate Risk	31/01/2027	Future Action	
3	The Council had not formally documented its assessment of retained risk against its risk appetite.	Moderate Risk	04/09/2026	Risk Accepted	
4	The Council's claims handling procedure did not clearly define the end-to-end claims management process. In particular, it did not set out how claims are referred to insurers, how progress was monitored, the criteria for formally closing claims, or arrangements to ensure continuity during staff absences.	Low Risk	30/11/2026	Future Action	
5	The Council did not have a formally defined claims recording framework supported by adequate data management and quality controls. As a result, the central claims log contained incomplete and inconsistent records, limiting the reliability of key claim information and the audit trail.	Moderate Risk	30/11/2026	Future Action	
6	There was no formalised internal reporting or monitoring of claims activity. Oversight was informal, reliant on external insurers and a single internal liaison, with no structured review of trends, outcomes, or lessons learned.	Low Risk	30/10/2026	Action Due	
7	Insurance activity was managed within a dedicated Finance post but was not well integrated with the Council's wider corporate risk management arrangements, leading to a lack of a joined-up approach to risk identification and mitigation.	Low Risk	31/11/2026	Future Action	
8	The Council relied heavily on an outsourced insurance arrangement supported by a single internal post, with staff knowledge mainly developed through handover and on-the-job experience. There was limited formal training, competency development, or documented guidance materials.	Low Risk	31/12/2026	Future Action	
9	Performance monitoring for the Insurance Team was limited to two basic KPIs focused on claim volumes. There was no evidence of a broader performance framework or regular structured review process to assess service quality, effectiveness, or outcomes.	Low Risk	31/03/2027	Future Action	

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Housing Fire Risk Management

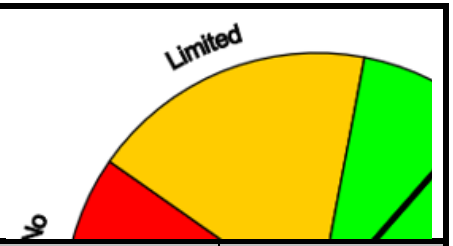


Control Objectives Examined	Controls Evaluated	Adequate Controls	Partial Controls	Weak Controls
To ensure that the Council has adequate control measures in place to comply with fire regulations (Regulatory Reform (Fire Safety) Order 2005) within relevant Council properties/buildings.	13	6	5	2
TOTALS	13	6	5	2

Rec No.	Summary of Weakness	Risk Rating	Original Action Date	Action Status	Revised Action Date
1	The Council's Fire Safety Policy had not yet been updated and formally approved to reflect current legislation, guidance and good practice. Although review work began in 2024, progress was delayed during 2024/25 following the directorate restructure, and the revised policy remained in draft at the time of the audit. No approved policy version or target completion date was in place.	Low Risk	30/10/2026	Delayed Future Action	30/04/2027
2	Although Fire Risk Assessments were being undertaken by competent assessors, the Council's operational arrangements for the frequency of Fire Risk Assessments had changed from those specified in the approved Fire Safety Policy without the policy and associated procedures first being formally updated and approved to reflect the revised arrangements.	Low Risk	30/10/2026	Delayed Future Action	30/04/2027
3	Governance arrangements for monitoring fire safety compliance were not fully evidenced following changes to management arrangements. In particular, formal minutes of the Fire Management Group were not consistently recorded and retained, reducing the documented audit trail of management oversight, decisions and progress against fire safety actions.	Low Risk	30/10/2026	Delayed Future Action	27/11/2026
4	Fire safety records were not consistently complete or readily accessible. Statutory inspection records, contractor certificates and supporting evidence of compliance monitoring were incomplete in some instances, reducing the Council's ability to readily demonstrate that statutory fire safety requirements had been met.	Moderate Risk	31/03/2027	Future Action	
5	The Council could not consistently demonstrate that annual fire safety information had been issued to residents and leaseholders, as evidence of distribution was not centrally retained.	Moderate Risk	30/10/2026	Delayed Future Action	27/11/2026
6	Monitoring arrangements were not effective in ensuring that all relevant Housing Officers and Independent Living Officers completed mandatory and role-specific health and safety training, and that refresher training was undertaken where required.	Low Risk	26/02/2027	Future Action	

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Information Security 2025-26



Control Objectives Examined	Controls Evaluated	Adequate Controls	Partial Controls	Weak Controls
Assess whether the backend server-side components supporting the OpenText Content Manager system had appropriate baseline cyber security controls implemented and operating effectively to protect the confidentiality, integrity and availability of the documents and related system processes.	9	7	0	2
Assess whether the OpenText Content Manager systems front-end application had appropriate security controls and access permission mechanisms implemented and operating effectively to ensure users can only access systems functionality, data and documents in accordance with their authorised roles and responsibilities.	11	1	0	10
TOTALS	20	8	0	12

Rec No.	Summary of Weakness	Risk Rating	Original Action Date	Action Status	Revised Action Date
1	Concerns were noted regarding the lack of proactive review and challenge of stale domain administrator accounts (specifically those linked to third-party support providers), the continued need for non-infrastructure domain admin assignments, the presence of stale generic service/system accounts, and the lack of documented evidence supporting the monthly stale Active Directory account review.	Low Risk	31/03/2027	Future Action	
2	Whilst the IT team advised that regular reviews of the security patching and vulnerability management tools, dashboards, alerts and standard reports were being undertaken, there were no documented procedures, retained review records, or management oversight available at the time of testing to evidence that such monitoring was being performed consistently.	Low Risk	31/03/2027	Future Action	
3	A data matching spot check confirmed leaver accounts remained enabled in the system, with the absence of formal periodic reconciliation between enabled system accounts and HR records being a contributing factor, increasing the risk of unauthorised access and data breaches.	Low Risk	31/12/2026	Future Action	
4	Two enabled privileged/administrator accounts belonging to former IT management staff were identified through a data-matching spot check against HR records and had not been disabled on departure from the Council.	Low Risk	31/12/2026	Future Action	

5	A point-in-time spot check found the Content Manager software version was five releases behind the latest available version, indicating opportunities to improve and strengthen patch and version-management controls.	Low Risk	31/10/2026	Implemented	
6	No proactive application-level security monitoring and alerting had been configured within Content Manager, meaning unusual, suspicious and unexpected activity that may suggest a breach of systems security or general misuse, may not be detected and investigated promptly.	Low Risk	31/03/2027	Future Action	
7	Data matching spot checks of access control lists and associated group memberships for four sensitive document libraries and record types against HR records, identified multiple examples of inappropriately broad (everyone), leaver, mover, or otherwise unjustified access related risks.	Moderate Risk	31/12/2026	Future Action	
8	Non-standard security objects known as "organisations" were identified on the Housing Tenancy folders access control lists, whose membership could not be readily established or provided for the auditor's data matching spot check, meaning the access control lists and corresponding security group members reports provided during evidence-gathering walkthroughs, may not have captured all users with access to this sensitive document library.	Low Risk	31/12/2026	Future Action	
9	High-risk sysadmin/support permissions in the Content Manager DMS are generally mapped to the user's standard AD accounts, rather than mapped to the users separate, dedicated administrator AD accounts, increasing the potential impact of a compromise.	Low Risk	31/12/2027	Future Action	
10	Data matching identified several examples where staff with management-level access to an employee's HR folder could not be readily reconciled to the employees current reporting line and management hierarchy.	Low Risk	31/03/2027	Future Action	

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RECOMMENDATION TRACKING

Final Report Date	Audit Assignments with Open Recommendations	Assurance Rating	Recommendations Open			
			Action Due	Delayed Action Due	Delayed Future Action	Future Action
13-Sep-21	Land Charges				2	
13-Sep-21	Street Naming & Numbering				1	
11-Feb-22	Cemeteries & Crematorium Income				3	
01-Mar-22	S106 Agreements				1	
02-May-22	Emergency Planning				2	
29-Sep-22	Council Tax 2022-23			1		
22-Aug-24	Customer Feedback 2023-24			1		
06-Mar-25	Housing Rental Income 2023-24	Reasonable			4	1
06-Mar-25	Commercial Rental Income	Reasonable			1	
11-Jun-25	Licensing	Reasonable		3	1	
14-Oct-25	Risk Management 2025-26	Reasonable			1	
04-Nov-25	Corporate Governance 2025-26	Reasonable		1		1
14-Nov-25	Food Hygiene 2023-24	Reasonable		2		
28-Nov-25	Business Change & Transformation	Reasonable	3	1		
23-Apr-26	Corporate Fire Risk Management	Limited	2		3	
05-May-26	Credit Cards	Reasonable				5
25-Jun-26	Fuel Cards	Limited	4	3		3
20-Jul-26	Waste Management	Reasonable	1	1		5
04-Sep-26	Insurance	Reasonable	2			6
21-Sep-26	Housing Fire Risk Management	Reasonable			4	2
30-Oct-26	Information Security 2025-26	Reasonable				9
		TOTALS	12	13	23	32

Action Due = The agreed actions are due, but Internal Audit has been unable to ascertain any progress information from the responsible officer.

Delayed Action Due = The original action date has now passed and Internal Audit has obtained status update comments from the responsible officer and a revised action date. This revised action date has now passed, but Internal Audit has been unable to ascertain any progress information from the responsible officer.

Delayed Future Action = The original action date has now passed and Internal Audit has obtained status update comments from the responsible officer and a revised action date which is in the future.

Future Action = The agreed actions are not yet due, so Internal Audit has not followed the matter up.

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Audit Assignments with Recommendations Due	Action Due				Delayed Action Due				Delayed Future Action			
	Critical Risk	Significant Risk	Moderate Risk	Low Risk	Critical Risk	Significant Risk	Moderate Risk	Low Risk	Critical Risk	Significant Risk	Moderate Risk	Low Risk
Land Charges												2
Street Naming & Numbering												1
Cemeteries & Crematorium Income											1	2
S106 Agreements												1
Emergency Planning												2
Council Tax 2022-23								1				
Customer Feedback 2023-24								1				
Housing Rental Income 2023-24											1	3
Commercial Rental Income												1
Licensing							1	2				1
Risk Management 2025-26												1
Corporate Governance 2025-26							1					
Food Hygiene 2023-24							1	1				
Business Change & Transformation			1	2				1				
Corporate Fire Risk Management			2								2	1
Fuel Cards			1	3			2	1				
Waste Management				1			1					
Insurance			1	1								
Housing Fire Risk Management											1	3
TOTALS			5	7			6	7			5	18

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HIGHLIGHTED RECOMMENDATIONS

Critical, Significant or Moderate Risk Recommendations Past Original Action Date

The following significant or moderate risk rated recommendations, that have not yet been implemented and have exceeded their original action date, are detailed for Committee's scrutiny.

Job Name	Cemeteries & Crematorium Income	Original Action Date	31/03/2023
Risk Rating	Moderate Risk	Revised Action Date	01/01/2027
Recommendation Number	8	Recommendation Status	Delayed Future Action
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
Lack of 2.5 years rent income for Crematorium valuing approximately £362.5k due lessee's Dignity Plc. The Council should be receiving market rent income from March 2020 onwards in line with the lease agreement though due to the COVID pandemic, there appears to be a delay on the formal valuation by the District Valuer. To enable Finance to account for an income reserve, the Head of Estates was requested to estimate a rent value, and this was confirmed as £145k per year back in 2021. Since then, there appears to be no progress made by Estates with Dignity to agree an interim rent sum, and the suggestion made by Finance to raise an invoice 'on account' for a larger value until such time as actual market rent value is determined has not been considered. At present, the Council are receiving a rent sum of £5k per annum (£1250 per quarter) based on the expired rent value, so there is a annual shortfall of approximate £140k rental income.	The Head of Estates to respond urgently on this unresolved matter to either formally claim the rent income due or enable Finance to make the appropriate provisions in the account.	Agreed	This is currently with the District Valuer who are looking to arrange a meeting with the other side this month, the issue they have had is providing evidence to support a valuation. Hopefully the meeting will help progress the situation and we will continue to chase. Lack of engagement from Dignity's agent, it is our intention to refer the matter to Arbitration. As of 16th September 2026 - The District Valuer is acting on behalf of the Council in these negotiations. Dignity contacted on 11th June to query whether the arrears could be paid in instalments. The Council have advised that this is acceptable in principle, however, we need to understand what their rental proposal is. They have yet to respond, despite further requests from the Council. I am advised that as Dignity are 'engaging' there are limited legal options for us to follow. It should also be noted that the value stated within the audit in relation to loss of rent cannot be validated since the negotiations are not yet complete. Ken Shirer is acting for NBBC he is chasing Dignity for a proposal to settle figure.

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Job Name	Licensing	Original Action Date	31/10/2025
Risk Rating	Moderate Risk	Revised Action Date	02/10/2026
Recommendation Number	9	Recommendation Status	Delayed Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
The Licensing fees have not been reviewed/updated since 2019-20. A review of the Licensing budget showed the function was in budget deficit in the past three years, which could indicate that full cost recovery was not being achieved.	We recommend that the Licensing fees should be reviewed at regular intervals to ensure full cost recovery is being achieved and \ compliance with the relevant fees regulations.	Environmental Health and Licensing Manager, and Licensing Team Leader. The fee review process is scheduled to commence this year, and a 1st draft document to be ready for presenting to the relevant body by October 25.	To be reviewed in line with new Licensing Policy.

Job Name	Housing Rental Income 2023-24	Original Action Date	01/09/2025
Risk Rating	Moderate Risk	Revised Action Date	31/12/2026
Recommendation Number	3	Recommendation Status	Delayed Future Action
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
The monthly reconciliation of housing rents to the General Ledger are ineffective as the financial data is not being matched from two independent sources of data.	We recommend that a valid rent reconciliation is performed monthly using income reports extracted from two separate independent sources i.e. General Ledger (Agresso) and Housing rent system (CX). Also, a reconciliation statement is prepared on completion to verify the balancing with narrative for any discrepancies investigated and resolved. The document is countersigned, and the final record is saved as a PDF.	This is something that was historically done but due to capacity has fell by the waste side. This needs to be re-introduced but whether this is monthly or quarterly basis may differ.	The level of debtors and creditors are currently being investigated to understand the difference between CX information and Agresso. Once this has been completed a monthly reconciliation will be re-instated. The team are now at full capacity with a manager beginning before the end of June 2026. This is now being picked up by them and a reconciliation will be processed by the new revised action plan date.

Job Name	Food Hygiene	Original Action Date	01/04/2026
Risk Rating	Moderate Risk	Revised Action Date	19/06/2026
Recommendation Number	3	Recommendation Status	Delayed Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
There was a lack of internal performance metrics and senior management oversight for food safety inspections, resulting in minimum inspection frequencies not being met in seven out of ten cases reviewed.	We recommend that the Council ensures that it complies with the Code of Practice for Food Law in relation to the frequency of inspections.	Will establish a KPI % of inspections completed within the required timeframe and inspection due dates for each quarter.	A LAEMS (Local Authority Enforcement Monitoring System) return, as attached will be taken to the next available CET for review.

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Job Name	Corporate Governance 2025-26	Original Action Date	30/04/2026
Risk Rating	Moderate Risk	Revised Action Date	31/10/2026
Recommendation Number	2	Recommendation Status	Delayed Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
The absence of a formally approved and documented Freedom of Information policy and procedures, has contributed to the inconsistent handling of requests and failure to consistently meet statutory deadlines.	We recommend that management develop, formally approve, and implement a standalone Freedom of Information policy and supporting procedures and ensure that staff receive appropriate training to promote consistent, compliant, and timely handling of FOI requests.	Internal procedural document to be created and approved by Senior Leadership Team (SLT) following which, will be saved on the Intranet for staff. This is likely to include information about Subject Access Requests, Member Enquiry Forms and Freedom of Information requests.	The department advised that the action date has been revised.

Job Name	Corporate Fire Risk Management	Original Action Date	01/07/2026
Risk Rating	Moderate Risk	Revised Action Date	30/04/2027
Recommendation Number	1	Recommendation Status	Delayed Future Action
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
The Council had not developed and implemented a Fire Strategy and was operating with an outdated Fire Safety Policy. In addition, there was a lack of alignment between Housing and Corporate Assets arrangements.	We recommend that the Council ensures it has a single coherent fire safety framework in place. This should include a Fire Strategy and be supported by aligned Fire Safety Policies for Housing and Corporate Assets.	Accepted. A single overarching Fire Safety Policy is currently being developed by the Senior Housing Health and Safety Officer. This will be supported by two separate fire strategies: one for corporate assets and one for housing assets. The aim is to issue a draft policy for consultation by the end of March 2026, with the final policy approved and implemented by 1 July 2026.	A new Fire Policy and Fire Safety Management Plan for Housing was presented to CCRH OSP on 22 October 2026. However, the panel requested further amendments to both policies and for them to be brought back to the OSP in February. If approved the documents will then need to go to Cabinet and finally Council in April. Whilst the Corporate Fire Safety Management Plan was approved by BRP OSP on 1 October as the Fire Safety Policy is an overarching policy for Corporate and Housing the delay on the Housing side will ultimately affect the Corporate side.

Job Name	Corporate Fire Risk Management	Original Action Date	01/08/2026
Risk Rating	Moderate Risk	Revised Action Date	31/03/2027
Recommendation Number	3	Recommendation Status	Delayed Future Action
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
With unclear lease or management agreements and no monitoring system there was a lack of a structured compliance framework to ensure statutory fire safety requirements and responsibilities are clearly	We recommend that the Management should review and update lease templates to explicitly define fire risk management responsibilities, including the requirements for fire risk assessments, review and frequency, and	Accepted.	NBBC have recruited a Land & property Estates Officer who will start with the team on 19th October 26. Their role will be to ensure all commercial tenants have adequate FRA and other documentation specified in the lease

recorded, evidenced, and monitored across corporate premises.	evidence provision. Where responsibility is transferred, Management should implement a formal assurance process that confirm that lessees and operators have undertaken suitable, and current fire risk assessments.		agreement. NBBC will support tenants with ensuring the FRA is of the required standard. Nine units have been identified as priorities, and have been requested to provide their FRA's and support is being provide to these where there are gaps in the quality or detail of their FRA's.

Job Name	Corporate Fire Risk Management	Original Action Date	01/09/2026
Risk Rating	Moderate Risk	Revised Action Date	
Recommendation Number	8	Recommendation Status	Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
Across the four corporate buildings reviewed, weaknesses were identified in emergency preparedness and evacuation arrangements. Emergency evacuation procedures were found to be either absent, inconsistent or out of date. In addition, inadequate arrangements were made for the management of Personal Emergency Evacuation Plans (PEEPs), including the absence of a centralised system, reliance on individual managers to communicate requirements during evacuations, and concerns regarding the secure storage and handling of sensitive personal data. There was also no evidence of formally designated and trained evacuation personnel across the four buildings. At the time of review, the training programme for Building Evacuation Co-ordinators and Fire Marshals had not been implemented. Furthermore, fire drills were not carried out at one of the four buildings reviewed (Ropewalk Multi-storey Car Park) and were conducted infrequently at two others (Gresham Road Depot and Museum & Art Galleries), resulting in non-compliance with fire safety regulatory requirements.	We recommend that Management should strengthen emergency preparedness arrangements across all relevant corporate buildings by: • reviewing, standardising, and formally approving up-to-date emergency evacuation procedures for all sites, particular attention given to multi-storey car parks. • implementing a centralised, secure system for the management and periodic review of PEEPs, with clear roles and responsibilities defined. • formally appointing and training Building Evacuation Co-ordinators (in locations where the arrangement is absence) and Fire Marshals, supported by a documented training programme. • establishing and monitoring a compliance fire drill schedule across all relevant corporate locations, with records retained and reviewed periodically. These measures will help ensure regulatory compliance and enhance the safety of building occupants.	Agreed All issues identified will be reviewed, and addressed as appropriate. Arrangements will also be made to ensure the appropriate training programme for fire safety personnel is implemented promptly.	

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Job Name	Corporate Fire Risk Management	Original Action Date	01/09/2026
Risk Rating	Moderate Risk	Revised Action Date	
Recommendation Number	9	Recommendation Status	Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
There was a lack of structured and consistently implemented fire safety management framework. There was no evidence of designated and trained evacuation personnel, and no formal training programme i for Building Evacuation Co-ordinators and Fire Marshals. In addition, fire drills were either not carried out or conducted infrequently.	We recommend that management establish a formal fire safety training framework, including designation and training of evacuation personnel across all sites. A programme of regular fire drills should be implemented and recorded, with periodic reviews.	Accepted All issues identified will be reviewed, and addressed as appropriate. Arrangements will also be made to ensure the appropriate training programme for fire safety personnel is implemented promptly.	

Job Name	Fuel Cards	Original Action Date	30/09/2026
Risk Rating	Moderate Risk	Revised Action Date	31/10/2026
Recommendation Number	2	Recommendation Status	Delayed Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
There was weaknesses in the authorisation and reconciliation of wildcard usage, including missing supervisor approvals and unexplained variances between manual records and fuel transaction data, reducing assurance over appropriate fuel card usage.	We recommend that controls over wildcard usage are strengthened by ensuring that wildcards are not issued unless the corresponding entry on the manual register has been formally authorised and signed by a supervisor or manager. A routine check of the manual register should be performed regularly, and where there are any incomplete authorisations, the card usage is subjected to further investigation.	Measures in action 1 will remove the number of wild cards. All wildcards will be held by Transport Services and issued as required but signed out to named individuals so all transaction can be logged and recorded correctly. Wild card usage will then form part of the monthly fuel card usage.	11 of the 7 hire vehicles have had these fitted by end of play 28/08/2026 (5 RCVs, 1 16t road sweeper 1 3.5t road sweeper). The other four vehicles (2 x 3.5t Luton vans, 2 x 3.5t caged tippers) will have units fitted as soon as we have received delivery of more mobile tracking units as our account is on stop with the supplier, a/w confirmation its been removed.

Job Name	Fuel Cards	Original Action Date	31/08/2026
Risk Rating	Moderate Risk	Revised Action Date	
Recommendation Number	5	Recommendation Status	Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
Mobile tracking units had been purchased to be installed in hire vehicles. However, they had not been fully deployed, and therefore not all journey data for hire vehicles was being captured to enable scrutiny of the	We recommend that the mobile tracking units are deployed in all the hire vehicles, and that a monitoring process is established to record when each unit is issued, activated, and returned at the end of the hire period. Regular checks should also be carried out to ensure the	To fit the operator's licence timescales any hire vehicle that is going to be in service for 28 days or more, we will install our tracking system into it. Any shorter period manual mileage tracking will be undertaken. This reflects the operational impact of installing and removing such systems from short term hires whilst ensuring that all hire	

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reasonableness of journeys and associated fuel costs.	mobile trackers remain in use and are capturing journey data as intended.	vehicle journeys and associated fuel costs remain subject to appropriate monitoring and scrutiny.	

Job Name	Fuel Cards	Original Action Date	31/08/2026
Risk Rating	Moderate Risk	Revised Action Date	18/10/2026
Recommendation Number	6	Recommendation Status	Delayed Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
The Quartix telematics system generates exception reports for out-of-boundary vehicle journeys, however the exception criteria did not include indicators such as out-of-hours and weekend journeys. In addition, existing exception reports were not being routinely reviewed, and no documented evidence was available to demonstrate that the current exceptions are reviewed to ensure compliance with HMRC 'benefit in kind' rules.	We recommend that the telematics exception reporting should be enhanced to include additional indicators such as out-of-hours and weekend vehicle use. Management should also ensure that all exception reports are subject to periodic, documented review, with clear evidence retained to demonstrate oversight and compliance.	Quartix will be set up to run the reports for boundary and out of hours reports, with anomalies and queries being sent by transport and depot manager to service managers on a monthly basis.	Reports are run at the start of every month covering the previous month by the Transport and Depot Manager. So the first live, actionable data after fuel card roll out will be first week of October for all of September's transactions. A list of all employees who cover a call out role has been received from HR. Work on going to ensure all vehicles that need out of hours are set up correctly with Quartix so the reports we receive are meaningful and actionable.

Job Name	Waste Management	Original Action Date	03/08/2026
Risk Rating	Moderate Risk	Revised Action Date	15/11/2026
Recommendation Number	7	Recommendation Status	Delayed Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
Although Cabinet had approved the implementation of the weekly food waste collection service and procurement activity was progressing, the Council had not achieved compliance with the statutory implementation deadline. In addition, the Council had not established a formal project plan to manage implementation of the statutory waste collection service.	We recommend that Management develop and implement a detailed formal project plan to achieve compliance with the weekly food waste collection requirements at the earliest practical date. This should include: • clearly defined milestones and target implementation dates. • allocation of responsible officers for each key activity. • monitoring and reporting arrangements to senior management and Members. • risk management arrangements - identification and mitigation of key risks impacting delivery. • procurement of vehicles/containers. • communications to residents.	Management accepts the recommendation. A project plan is being developed to support implementation, with a target implementation date of October 2026. The Council is engaging with DEFRA in relation to the transitional arrangements and is satisfied that the proposed timescale is consistent with the flexibility available to authorities working towards full compliance. Procurement of the resources required to deliver the change is underway, and progress is being monitored to ensure delivery within the agreed timescale. Progress against the project plan will be reported to Members at regular intervals.	Procurement routes have been confirmed for vehicles and receptacles, due to be signed off at Cabinet on the 7th October. Once agreed the formal plan will be finalised.

	• training of relevant operational and supporting staff		

Job Name	Insurance	Original Action Date	31/10/2026
Risk Rating	Moderate Risk	Revised Action Date	
Recommendation Number	1	Recommendation Status	Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
Insurance documentation was incomplete and not consistently maintained. While core policies were in place, records were fragmented, with some periods supported only by secondary evidence or missing documentation entirely, limiting transparency over the Council's full insurance position	We recommend that management implement a centralised and consistently maintained insurance register, supported by full policy documentation (including schedules and endorsements) for all material covers. Responsibility for maintaining these records should be clearly assigned, with periodic reviews to ensure completeness and alignment with organisational risks.	A central folder will be configured whilst the corporate implementation of Sharepoint is being progressed. Once Sharepoint is available an Insurance Group can be created to save all necessary documents in a shared environment.	

Job Name	Housing Fire Risk Management	Original Action Date	30/10/2026
Risk Rating	Moderate Risk	Revised Action Date	27/11/2026
Recommendation Number	5	Recommendation Status	Delayed Future Action
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
The Council could not consistently demonstrate that annual fire safety information had been issued to residents and leaseholders, as evidence of distribution was not centrally retained.	We recommend that Management implement a consistent process for recording and retaining evidence that annual fire safety information has been issued to all residents and leaseholders. Records should be centrally maintained, accessible for audit trail purposes, and subject to periodic monitoring to demonstrate compliance.	As part of the cost-saving initiative last year, annual fire safety advice and notifications were hand-delivered to all relevant residents. However, the Team had not consider formally recording this activity on individual residents' records within the CX Housing system to provide an auditable record of compliance. The Council provides a range of fire safety information and notices to residents and the public through its website, and with a new text-messaging service soon to be implemented. The annual notification process for this year is due to commence in October. Going forward, the issue of the notifications will be recorded on individual tenants' CX Housing records to provide evidence of compliance.	Annual information is due to be sent to residents in November. Evidence will be provided at that point.

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Job Name	Business Change & Transformation	Original Action Date	31/10/2026
Risk Rating	Moderate Risk	Revised Action Date	
Recommendation Number	3	Recommendation Status	Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
Whilst we acknowledge that the Council was developing its Transformation Strategy, it had not implemented a formal Business Change Plan to manage change projects.	We recommend that Management should develop and implement a Business Change Plan to provide a structured and coordinated approach to delivering business change and transformation across the Council. The Change Plan should outline how the Council will move from its current state to a desired future state - whether that change involves new technology, restructuring, processes, culture, or strategy.	Agreed. The Council was getting its business change and transformation arrangements in order, starting with the development of the Transformation Strategy. Once this document had been approved and adopted, we could start developing the necessary change plan, governance arrangements, systems and processes around it, to support the delivery of business change and transformation. The Acting Transformation Delivery Manager will take forward this action point and discuss it with the new Assistant Director for Digital and Business Change, Anthony Baxter, when they commence post on 1 December 2025.	

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Low Risk Recommendations Over 36 Months Past Original Action Date

The following 12 low risk rated recommendations, that have not yet been implemented and have exceeded their original action date by more than 36 months, are also detailed for Committee's scrutiny.

Job Name	Emergency Planning	Original Action Date	31/03/2023
Risk Rating	Low Risk	Revised Action Date	31/12/2026
Recommendation Number	3	Recommendation Status	Delayed Future Action
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
Emergency Planning and media training for staff and elected members remains outstanding though we appreciate that CSW is currently reviewing the Council's training needs.	Training or at least an awareness programme is delivered to both keys officers and elected members at the earliest opportunity to ensure that the Council has a coherent approach in the event of an incident.	Agreed	Unable to comment on media training as assume that is part of a wider offering. However, in relation to training on EP, colleagues at CSW are currently undertaking the 2 year review of the plan and will then role out training, this will include officers and members. Target date for completion will be March 2026. The risk regarding media training is accepted. This has been undertaken in the past but will be rolled out again during 2026/27. An Emergency Planning Officer has been recruited and is going through the checks currently. Once they start within the next 4 weeks, they will pick up training and progress so far with CSW. Have picked this up with the newly appointed Officer at NBBC (17/09/2026) Will update and close off once training arranged

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Job Name	Emergency Planning	Original Action Date	31/03/2023
Risk Rating	Low Risk	Revised Action Date	31/12/2026
Recommendation Number	4	Recommendation Status	Delayed Future Action
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
The approved EMP meets the framework for NBBC'S effective response to local and major incidents, however the actual testing of EMP has not been conducted. Therefore, full reliance cannot be placed on the EMP to ensure that it operates in practice, or that staff are aware of their responsibilities. This may limit the effectiveness of plans in real life events.	The functionality and effectiveness of the EMP needs to be formally tested to confirm that the EP, Major Incident Plan and the EMC work in practice to demonstrate that NBBC are ready to act as Category 1 responder.	EP is currently under review and training will then follow. However, the LRF run regular training exercises and NBBC are involved as first responder. This tests both a wider emergency response to include third parties and our own internal mechanisms. Target date for completion will be March 2026	This is in progress with the Solihull Partnership. However, alternative arrangements may be made internally with NBBC. A new post has been recruited to lead emergency planning but recruitment checks are currently underway. Once in post, they will review the EP and coordinate with CSW to ensure our plan is fit for purpose and that training is up to date. New NBBC employee started on 7th July 2026 - Business Continuity and Emergency Planning Officer. Approval given via SLT on Tuesday 15th Sept 2026 for LIVE test event to take place in Dec 2026. This will continue ongoing to ensure compliance moving forward. Have updated action date to Dec 2026 - once test is completed and we can prove this we can then close this action off.

Job Name	Cemeteries & Crematorium Income	Original Action Date	31/03/2023
Risk Rating	Low Risk	Revised Action Date	11/01/2027
Recommendation Number	1	Recommendation Status	Delayed Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
An external firm has also been commissioned to digitize the cemetery plans, which will assimilate into the EPITAPH cemeteries database to enable records to be archived to its cloud memory. It understood that the first set of plans have been drafted, however remain at pending stage, as there are details on areas of the plans that require confirming by the Council	We recommend that the outstanding details are confirmed to the contractor as soon as possible. Also, the contracted project is monitored regularly to ensure that the target completion is achieved.	Subject to available resources within the Cemeteries Team, follow up the 1st draft plans with revisions/additions & get the plans formally adopted.	The digitised ledger transcriptions will be uploaded into Epitaph to help provide a more complete historical record of the data held there. This activity is not scheduled to begin until the data cleansing work is finished, there are currently no confirmed timelines for when this will take place.

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Job Name	Cemeteries & Crematorium Income	Original Action Date	31/03/2023
Risk Rating	Low Risk	Revised Action Date	11/01/2027
Recommendation Number	5	Recommendation Status	Delayed Action Due
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
There is concern over the accuracy and completeness of the cemetery data held on the new EPITAPH system. Although it was advised that testing was conducted on the migration process to ensure accuracy and completeness of data transfer before the new system went live, irregularities have been noted during audit review.	We recommend that:1. All reservation and repurchases records are revisited on both systems and omitting data is updated on the EPITAPH plot records.2. Further verification checks/tests need to be completed to ensure statutory records from EPILOGUE system have migrated over to the current system in the event that the unsupported EPILOGUE system becomes inaccessible. 3. A project briefing note and any lesson learns should be identified and recorded on the Project log and reported to the Corporate Asset Management Team (CAMT) to assist future projects.	This is subject to available resources within the Cemeteries Team, beyond those required for routine service delivery. This will require an officer with knowledge of the cemeteries processes, inc both the current & previous software systems & an understanding of the ledger records. There will be a salary cost implication for this piece of work, which requires further discussion between the Director Public Services & Deputy CEO. The data transferred does contain errors. Work has been underway to cross reference. With the resource available it is estimated that it could take up to approximately 4 years to complete at the current pace. Epilogue data has been exported for resilience and reference should it become inaccessible.	This will require external resources to go through backlog of data to update.

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Job Name	Land Charges	Original Action Date	31/03/2022
Risk Rating	Low Risk	Revised Action Date	26/02/2027
Recommendation Number	6	Recommendation Status	Delayed Future Action
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
The LCC Service has been making a substantial surplus annually in the last three years (and for a number of years prior to that). This is clearly in breach of the Local Authorities (England) (Charges for Property Searches) Regulations 2008 and the Local Government Property Search Services – Costing and Charging Guidance 2009. Regulation 6 (3), states that 'A local authority must take all reasonable steps to ensure that over the course of any period of three consecutive financial years, the total income (including notional income from internal transactions) from such charges and recharges does not exceed the total costs of granting access to property records.'	The budget should be monitored, and fees and charges adjusted as appropriate, to ensure compliance with the regulations.	Agreed	A time cost analysis should be completed when the transition to HMLR has taken place. LH notes 25/3/2026 - A significant piece of work is being undertaken by an external consultant to review income generation in Land Charges, Planning and Street Naming and Numbering. LH In respect of Planning Income Generation and Street Naming and Numbering, two Cabinet reports have been prepared, which, subject to final approval from the Finance Team and the Monitoring Officer, will be taken to Cabinet in May 2026 and to Full Council in July 2026. If the recommendations of both reports are approved, then increased Planning and Street Naming and Numbering Fees and Charges for those a range of existing and proposed discretionary services will be introduced in Autumn 2026. Price review reports would then be required to be prepared in respect of both services once time recording has been established within both teams. This process will ensure that a proper basis for fee setting is established for both service areas, and that cost recovery can be properly demonstrated in accordance with legislative requirements. In respect of Fees and Charges for the Local Land Charges Service, the setting of such fees is subject to specific legislation that the Planning and Street Naming and Numbering Services are not bound by. Upon a review of the legislative requirement, it has become evident that further support from finance in demonstrating cost recovery for the Local Land Charges service is required. The Finance Team have therefore been contacted and a request for support has been made Given the external consultant was unable to work for us between May 10 and August 10 2026, whilst her contract was resolved, this has all been delayed and it is now hoped that the work will be concluded by year end LH Notes 16/10 - the income generation project for LLC is underway via the Special Projects Officer

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Job Name	Land Charges	Original Action Date	31/03/2021
Risk Rating	Low Risk	Revised Action Date	31/03/2027
Recommendation Number	7	Recommendation Status	Delayed Future Action
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
Section 9, of the Statutory Instrument 2008 No. 3248 (of the above regulations) requires the Council to publish annually its LLC financial statement for the previous year and estimates used to calculate the LLC Fees for the current financial year. However, the Council has not published this information since the Regulations came into force in 2010.	The LLC financial statement and estimates required under Section 9 of the Local Authorities (England) (Charges for Property Searches) Regulations 2008 should be published annually. An appropriate mechanism should be put in place to ensure that the relevant information is published annually.	Agreed	LH Notes June 2026 - The consultant coordinating this work ceased working for the Council in mid-May due to issues to contractual issues. It was anticipated that the problem would re resolved at Cabinet on 15 July 2026, enabling the work to recommence in mid-August 2026. It was estimated that the outstanding background work would be completed by December 2026, at which point the audit action could be finalised. LH Notes 3/9/2026 -The Consultant started work for the Council again on 10 August 2026. The AD for Planning has on 3 September written to the S151 Officer/SD for Planning to ask for a steer about whether a CET paper is needed regarding the publication of the statement LH Notes 16/10 - LH took a paper to CET on 6 October and the following was agreed: not to publish yet, acknowledging the risks of this given one hasn't been published since the requirement came in in 2010. The ongoing income generation work will establish accurate data on fees and costs on which to move forwards and then a decision will be taken about whether we then publish the statement at a later date, even if it does show a significant loss, given we do have a mitigation plan.

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Job Name	S106 Agreements	Original Action Date	31/03/2022
Risk Rating	Low Risk	Revised Action Date	31/03/2027
Recommendation Number	5	Recommendation Status	Delayed Future Action
Summary of Weakness	Recommendation	Management Response/Action Details	Status Update Comments
There were no written procedures available to assist the relevant staff (especially new starters) involved in the monitoring of s106 agreements.	The procedures for the s106 monitoring system should be formally documented, stored in a central location, maintained up to date, and made available to the relevant staff involved in administering the system.	Agreed	LH Comments 25/3/2026 - Many actions following the Section 106 Agreement Audit that took place in Summer 2025 are being undertaken across the Council. The Assistant Director for Planning has created a dedicated Section 106 Monitoring Officer Post and interviews are taking place in March 2026. It should also be noted that NBBC is also moving forwards with procuring S106 Monitoring software and this is expected to be rolled out in Autumn 2026. Once that post is recruited to, and progress has been made with procuring the software, this will be a sensible time to formally document the matters listed. In the meantime, and in advance of the S106 Monitoring Post starting, a how to guide was produced of how S106 obligations are administered at NBBC, this is by way of an interim measure pending the full polices and guidance being produced later in 2026. LH Notes 3/9/2026 - Permanent Officer appointed on 1 August and Exacom software procurement progressing well, contracts signed and roll out expected by end of 2026. Written guidance to be published following go-live at the end of 2026/start of 2027

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Job Name	Street Naming & Numbering	Original Action Date	31/03/2022
Risk Rating	Low Risk	Revised Action Date	29/01/2027
Recommendation Number	3	Recommendation Status	Delayed Future Action
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
A review of the SNN budget for the past five years shows that the service has generated a profit in the first four years, though for 2020/21 there was an under-recovery of costs of approximately £1.8k. The charges should not exceed the cost of providing the service, so the Council is in breach of the regulations.	The SNN income and expenditure should be regularly monitored, and fees and charges adjusted as appropriate to ensure compliance with the regulations.	Agreed	The SNN fees are in the process of being reviewed. LH notes 3/9/2026 - A significant piece of work is being undertaken by an external consultant to review income generation in Land Charges, Planning and Street Naming and Numbering. Given the external consultant was unable to work for us between May 10 and August 10 2026, whilst her contract was resolved, this has all been delayed and it is now hoped that the work will be concluded by year end. LH Notes 16/10 - Cabinet report finalised and to be presented to cabinet on 4 November

Job Name	Council Tax 2022-23	Original Action Date	31/12/2022
Risk Rating	Low Risk	Revised Action Date	30/09/2026
Recommendation Number	3	Recommendation Status	Delayed Action Due
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
Discounts, disregards, and exemptions appear to have been only reviewed where a change in circumstances notification has been received. With the exception of single person discounts which have been reviewed up to 2020/21 as part of the annual National Fraud Initiative (NFI) data matching exercise, a full review of discounts, disregards and exemptions did not appear to have been undertaken for some time.	It is acknowledged that in the last two years, the Team's priority has been given to ensuring that the various covid-19 government grants were distributed to the community/ businesses on time. However, formal review of discounts, disregards, and exemptions should be scheduled to ensure that relevant accounts are still eligible.	Timetable of reviews for discount disregard and exemption classes has been produced by/for Visiting Officers to mainly complete. An evaluation is currently ongoing as to the best method of reviewing SPD's	Resources on the Billing team over the last couple of years have not been sufficient to take on a full SPD review, meaning we would have to appoint an external company to carry out this work. The alternative that I am looking at is to introduce a continuous rolling SPD review for example 100 a month and this is then factored into the daily work. Changes on the team over the last few months have meant that with recruitment and training we have had not had enough trained staff to deal with the daily work alone but this situation has improved and therefore we can look to introduce a rolling SPD review but it won't be before the end of this financial year.

Nuneaton & Bedworth Borough Council – Audit Progress Report

Previously Reported Recommendations Now Risk Accepted

Management has decided that the following recommendations are no longer going to be implemented. These are detailed for Committee's scrutiny.

Job Name	HEART (Home Environment Assessment & Response Team)	Original Action Date	07/05/2024
Risk Rating	Low Risk	Revised Action Date	31/03/2027
Recommendation Number	4	Recommendation Status	Risk Accepted
Summary of Weakness	**Recommendation**	**Management Response/Action Details**	**Status Update Comments**
The HEART partnership agreement highlights operational responsibilities for the HEART MB. Although majority of the actions are being achieved, there is one action that appears be absent in relation to undertaking a risk assessment of the service to monitor risks in the forthcoming year.	MB to ensure a risk assessment record of the HEART service is completed.	Agreed	Teams meeting held with Head of Home Environment Services in April 2026 - A decision has been made for the hosting responsibility of HEART service to be reviewed. This will be discussed at the next HEART Board meeting scheduled for the 19th May 2026. November 2026 - Management accepts the risk associated with this recommendation, as recent changes to the rules governing Disabled Facilities Grant (DFG) expenditure have altered the risk profile. The risk will continue to be actively monitored and managed through established delivery arrangements, with oversight provided by the HEART Board.

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO.8

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to: Audit and Standards Committee

Date of Meeting: 1st December 2026

Subject: Treasury Management 26/27 – Mid Year Review

Portfolio: Not Applicable

Responsible Officer: Assistant Director - Finance

Corporate Plan – Theme: Your Council

Corporate Plan – Aim: Deliver continued forward financial planning to safeguard the finances of the Council.
Strive for transparency and accountability, in all that we do.

Ward Relevance: All

Public or Private: Public

Amendment to Budget: No **Council Tax Related**: No

Recommendation to Council: Yes

Forward Plan: Not Applicable

Subject to Call-in: Not Applicable

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1. Purpose of Report

1.1. The Council is required through the CIPFA Code of Practice on Treasury Management (the Code) and the CIPFA Prudential Code for Capital Finance in Local Authorities (the Prudential Code) to report to full Council a mid-year review.

1.2. This report sets out the Council's treasury position as at 30th September 2026.

2. Recommendations

2.1. It be Recommended to Full Council that the mid year Treasury Management Report for 2026/27 be noted.

3. Background

Treasury management

3.1. The Council operates a balanced budget, which broadly means that cash raised during the year will meet its cash expenditure. Treasury management supports this by planning cash flows and investing surplus funds with low-risk counterparties. Security and adequate liquidity take priority over optimising investment returns.

3.2. In addition, the treasury management service provides details on the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer-term cash flow planning to ensure the Council can meet its capital spending operations.

3.3. The management of longer-term cash may involve arranging long or short-term loans, or using longer term cash flow surpluses, and on occasion any debt previously drawn may be restructured to meet Council risk or cost objectives.

3.4. Accordingly, treasury management is defined as:

> "The management of the local authority's borrowing, investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks."

CIPFA Consultation on Treasury Management and Prudential Codes of Practice

3.5. The Chartered Institute of Public Finance and Accountancy, having consulted with local authorities over the past year, is currently weighing up potential changes to the Codes and the timing of their implementation. At the time this report was created, the focus seems to primarily be on the Non-Treasury investment aspects of local authority activity. These may fall under the auspices of Government

in due course. Officers will provide an update on any material developments/changes as they arise.

Introduction

3.6. This report has been written in accordance with the requirements of the Chartered Institute of Public Finance and Accountancy's (CIPFA) Code of Practice on Treasury Management (revised 2021).

3.7. The primary requirements of the Code are as follows:

- Creation and maintenance of a Treasury Management Policy Statement which sets out the policies and objectives of the Council's treasury management activities.
- Creation and maintenance of Treasury Management Practices which set out the way the Council will seek to achieve those policies and objectives.
- Receipt by the full Council of an annual Treasury Management Strategy Statement - including the Annual Investment Strategy and Minimum Revenue Provision Policy - for the year ahead, a Mid-year Review Report (this report) and an Annual Report covering activities during the previous year. Quarterly reports are also required for the periods ending April to June and October to December and are submitted to Audit and Standards Committee.
- Delegation by the Council of responsibilities for implementing and monitoring treasury management policies and practices and for the execution and administration of treasury management decisions.
- Delegation by the Council of the role of scrutiny of treasury management strategy and policies to a specific named body. For this Authority, the delegated body is Audit and Standards Committee:

3.8. This quarterly report has been prepared in compliance with CIPFA's Code of Practice on Treasury Management, and covers the following:

- An economic update for the first half of the 2026/27 financial year;
- A Review of the Treasury Management Strategy Statement and Annual Investment Strategy

- The Council's capital expenditure, as set out in the Capital Strategy, and prudential indicators
- A review of the Authority's investment portfolio for 2026/27;
- A review of the Authority's borrowing strategy for 2026/27;
- A review of any debt rescheduling undertaken during 2026/27;
- A review of compliance with Treasury and Prudential Limits for 2026/27

4. Economic Update for the first half of 2026/27

4.1. The Council's in-house team of qualified finance staff monitor and maintain the Council's Treasury Management activity in line with the Council's Strategy. The Council employs MUFG Group as its treasury management advisor and officers hold regular meetings with them concerning existing and future potential economic circumstances regarding both investments and short/long-term borrowing.

4.2. The first half of the financial year (April to September) saw:

- The UK economy continued to show resilience despite ongoing energy market pressures, with GDP increasing by 0.4% m/m in July, following growth of 0.5% in the quarter of June 2026.

- Average wage growth excluding bonuses was 3.5% in July, compared with 3.4% in April, remaining broadly stable. These figures compare the average wage bill over a three-month period with the same period a year earlier: February–April in 2026 against February–April in 2025 for the April figure, and May–July for the July figure.

- CPI inflation stayed at 2.8% in May, but since then has increased to 3.1% in August and is forecasted to rise to 4.3% by January 2027.

- 10-year gilt yields changing between 4.69% and 5.43%, ending at 5.43% at the end of June.

4.3. The 0.4% rise in GDP in July 2026 was the biggest rise since the beginning of the Middle East conflict and suggests the resilience in the UK economy may continue into the second half of the year. The rise in GDP was spread throughout the UK economy with Services, Industrial production and construction all reporting rises in output.

4.4. There remains a risk the current economic resilience may weaken as rising energy prices, including the expected increase in the energy price cap in January, and higher borrowing costs begin to place further pressure on the economy.

4.5. Retail sales volumes increased across most categories, except “Other stores” and fuel. Overall sales were 2.4% higher than in August 2025, suggesting that consumer spending remains relatively strong despite higher energy prices and borrowing costs. However, further expected inflation and the increase in the energy price cap due in January could place additional pressure on household incomes and spending over the coming months

4.6. Public sector net borrowing was £23.3bn in May, £5.6bn above the Office for Budget Responsibility (OBR) forecast. The overshoot was largely due to higher debt interest payments following the rise in RPI in March. Tax receipts of £85.5bn were also below OBR expectations.

4.7. Government borrowing reached £18.3bn in August, above the OBR forecast of £14.8bn, reflecting higher debt interest payments and increased spending on public services.

4.8. PWLB borrowing rates have increased since the last update, generally ranging from 5.93% to 6.61% for borrowing periods of 5 to 50 years. PWLB rates are influenced by government gilt yields, so changes in gilt market rates affect the Council's cost of borrowing.

Monetary Policy Committee (MPC) Meetings

4.9. There were 4 Monetary Policy Committee (MPC) meetings at the Bank of England during the first half of the year. These occurred on 30th April 2026, 18th June 2026, 30th July 2026 and 17th September 2026.

4.10. The Bank of England maintained the base rate at 3.75% throughout the first four meetings of the year. However, the committee vote shifted from 8-1 in favour of holding rates at the start of the year to 6-3 by September, with three members favouring an increase to 4.0%.

4.11. Although this report would not normally cover MPC meetings outside the reporting period, the Bank of England increased the base rate to 4.0% at its meeting on 5 November, with an 8-1 vote. The remaining member favoured a further increase to 4.25%. The impact of this change will be covered in the Q3 report

Interest Rates

4.12. The Council's treasury advisers, MUFG, provide support in assessing interest rate forecasts and developing the Council's view on future rates. The PWLB forecasts below are based on the Certainty Rate, which is 0.20% (20 basis points) below the standard PWLB rate. This rate has been available to most local authorities since November 2012.

4.13. MUFG's latest forecast, dated 21 September 2026, expects short, medium and long-term interest rates to fall over the next one to two years. However, this remains a forecast and will depend on movements in gilt yields, economic conditions and when the Bank of England reduces the base rate.

4.14. The HRA can access a further 0.60% reduction on the Certainty Rate. However, this is restricted to borrowing for new housing developments or refinancing debt relating to previous new builds.

4.15. While wider market expectations suggest the Bank of England base rate could rise to between 4.5% and 4.75%, MUFG's view is that rising energy prices, including an

expected increase of over 20% in the energy price cap in January, and higher mortgage rates will put pressure on household finances. This is likely to reduce consumer spending and weaken economic growth we have seen in the first half of the year.

MUFG Corporate Markets Interest Rate View 21.09.26													
	Dec-26	Mar-27	Jun-27	Sep-27	Dec-27	Mar-28	Jun-28	Sep-28	Dec-28	Mar-29	Jun-29	Sep-29	Dec-29
BANK RATE	4.00	4.00	4.00	3.75	3.50	3.25	3.25	3.25	3.25	3.25	3.25	3.25	3.25
3 month ave earnings	4.00	4.00	4.00	3.80	3.50	3.30	3.30	3.30	3.30	3.30	3.30	3.30	3.30
6 month ave earnings	4.20	4.10	4.00	3.80	3.70	3.50	3.40	3.40	3.40	3.40	3.40	3.40	3.40
12 month ave earnings	4.80	4.60	4.40	4.20	4.00	3.80	3.70	3.70	3.70	3.70	3.70	3.70	3.70
5 yr PWLB	5.60	5.60	5.30	5.10	4.70	4.50	4.50	4.40	4.40	4.30	4.30	4.30	4.30
10 yr PWLB	6.00	5.90	5.60	5.40	5.00	4.80	4.80	4.70	4.70	4.60	4.60	4.60	4.60
25 yr PWLB	6.50	6.40	6.10	5.90	5.60	5.30	5.30	5.30	5.30	5.30	5.20	5.20	5.20
50 yr PWLB	6.10	6.10	5.80	5.50	5.30	5.10	5.00	5.00	5.00	5.00	4.90	4.90	4.90

5. The Council's Treasury Management Strategy Statement and Annual Investment Strategy Update

5.1. The Treasury Management Strategy Statement (TMSS) for 2026/27, including the Annual Investment Strategy, was approved by the Council on 25th February 2026.

5.2. There are no proposed changes to either the TMSS or the Treasury Management Practices (TMPs) as they currently meet the Council's requirements.

6. The Council's Capital Position (and Prudential Indicators)

6.1. This part of the report contains the following updates:

- The Council's Capital Expenditure Plans
- How the capital programme is being funded
- The impact of any changes in the capital expenditure plans on the prudential indicators (and the underlying need to borrow)
- Compliance with the limits in place for borrowing activity

Prudential Indicator for Capital Expenditure

6.2. The table below compares the original capital expenditure budget agreed in February with the revised estimates. The changes reflect approvals made by Cabinet since the original budget was set.

Capital Expenditure by Service	2026/27 Original Budget £m	2026/27 Revised Budget £m
Business & Regeneration	2.305	7.859
Resources & Corporate Services	0.100	0.451
Housing	7.899	8.030
Planning and Enforcement	2.007	2.558
Leisure. Communities and Health	4.790	7.491
Misc. Projects	0.050	0.0
GF Total	17.151	26.390
HRA	14.125	17.406
Total NBBC Capital	31.276	43.796

6.3. The General Fund capital changes comprise £7.152m of expenditure carried forward from 2025/26, agreed by Cabinet on 15th July 2026, and £2.086m of capital works approved by Cabinet since February 2026. The new expenditure includes increases for Grayson Place (£0.777m) and Bedworth Physical Activity Hub (£0.620m), increases to three existing projects and the introduction of four new projects.

6.4. The HRA capital changes comprise £2.859m of expenditure carried forward from 2025/26, agreed by Cabinet on 15th July 2026, and £0.422m for new property acquisitions agreed on 3rd September 2026. Other changes offset one another and have no overall net effect.

Changes to the Financing of the Capital Programme

6.5. The table below sets out how the Council's capital expenditure will be financed and the resulting borrowing requirement. Any expenditure not funded through capital receipts, grants, reserves or revenue contributions will need to be financed through borrowing. This increases the Council's Capital Financing Requirement (CFR), which is reduced over time through the Minimum Revenue Provision (MRP) charged to revenue.

Capital Expenditure	2026/27 Original Budget £m	2026/27 Revised Budget £m
Total Capital Expenditure	31.276	43.796
Financed by:		
Capital Receipts	0.100	0.398
Capital Grants	15.767	15.837
Capital Reserves	13.974	18.614
Revenue	0.259	0.434
Total Financing	30.100	35.283
Borrowing Requirement	1.176	8.513

Changes to the Prudential indicators for the Capital Financing Requirement (CFR), External Debt and the Operational Boundary

6.6. The table below shows the CFR, which is the underlying need to incur borrowing for a capital purpose. It also shows the expected debt position over the period, known as the Operational Boundary.

Prudential Indicator – Capital Financing Requirement (CFR)

6.7. We are on target to achieve the original forecast Capital Financing Requirement.

Prudential Indicator – the Operational Boundary for External Debt

	2026/27 Original Budget £m	Current Position £m	2026/27 Revised Estimate £m
Prudential Indicator – Capital Financing Requirement			
CFR – General Fund	53.40	54.26	54.26
CFR – HRA	97.92	91.24	91.24
Total CFR	151.33	145.50	145.50
Net Movement in CFR	13.85	7.68	7.68
Prudential Indicator – the Operational Boundary for external debt			
Borrowing	143.0	144.86	144.86
Other long-term liabilities*	2.0	0.64	0.64
Total debt (year end position)	145.0	145.50	145.50

** Includes lease liabilities recognised under IFRS16 etc*

Limits to Borrowing Activity

6.8. This prudential indicator is a key control over Treasury activity. It ensures that over the medium term, net borrowing (borrowings less investments) will only be for a capital purpose. Gross external borrowing should not, except in the short term, exceed the total of CFR in the 2025/26 plus the estimates of any additional CFR required for 2026/27 and next two financial years. This allows some flexibility for limited early borrowing for future years (for example when the Council believes that fixing the interest rate is preferential). The Council has approved a policy for borrowing in advance of need which will be adhered to if this proves prudent.

	2026/27 Original Budget £m	Current Position £m	2026/27 Revised Estimate £m
Borrowing	90.71	70.71	90.71
Other long-term liabilities*	0.64	0.64	0.64
Total debt	91.35	71.35	91.35
CFR* (year end position)	151.33	145.50	145.50

* *Includes lease liabilities recognised under IFRS16 etc*

6.9. A further prudential indicator controls the overall level of borrowing. This is the Authorised Limit which represents the limit beyond which borrowing is prohibited and needs to be set and revised by Members. It reflects the level of borrowing which could be affordable in the short term, but is not sustainable in the long-term. It is the expected maximum borrowing need, with some headroom for unexpected movements. This is the statutory limit determined under section 3 (1) of the Local Government Act 2003 (England & Wales).

Authorised limit for External Debt	2026/27 Original Indicator	2026/27 Revised Indicator
Borrowing	153.0	153.00
Other long-term liabilities*	4.0	4.0
Total	157.00	157.00

7. Borrowing

7.1. The Council's capital financing requirement (CFR) for 2026/27 is £145.50m. The CFR denotes the Council's underlying need to borrow for capital purposes (and combines both the General Fund and the HRA Capital requirements). If the CFR is positive the Authority may borrow from the PWLB or the market (external borrowing), or from internal balances on a temporary basis (internal borrowing).

7.2. The balance of external and internal borrowing is generally driven by market conditions. The table under paragraph 6.8 above shows the Council has borrowings (as of the 30th September 2026) of £70.71m and has therefore utilised £74.15m of cash flow funds in lieu of borrowing. This is a prudent and cost-effective approach in the current economic climate but will require ongoing monitoring if gilt yields remain elevated, particularly at the longer-end of the yield curve (25 to 50 years).

7.3. To minimise investment risk, the Council has reduced the overall debt liability by repaying £10.00m of external debt. However, this policy will require ongoing monitoring if upside risks to gilt yields prevail.

7.4. The Council is prudently forecasting to borrow £25.00m by the end of the year and repay another £5.00m of previously agreed loans.

PWLB maturity Certainty Rate (gilts plus 80bps) year to date at 30th September 2026

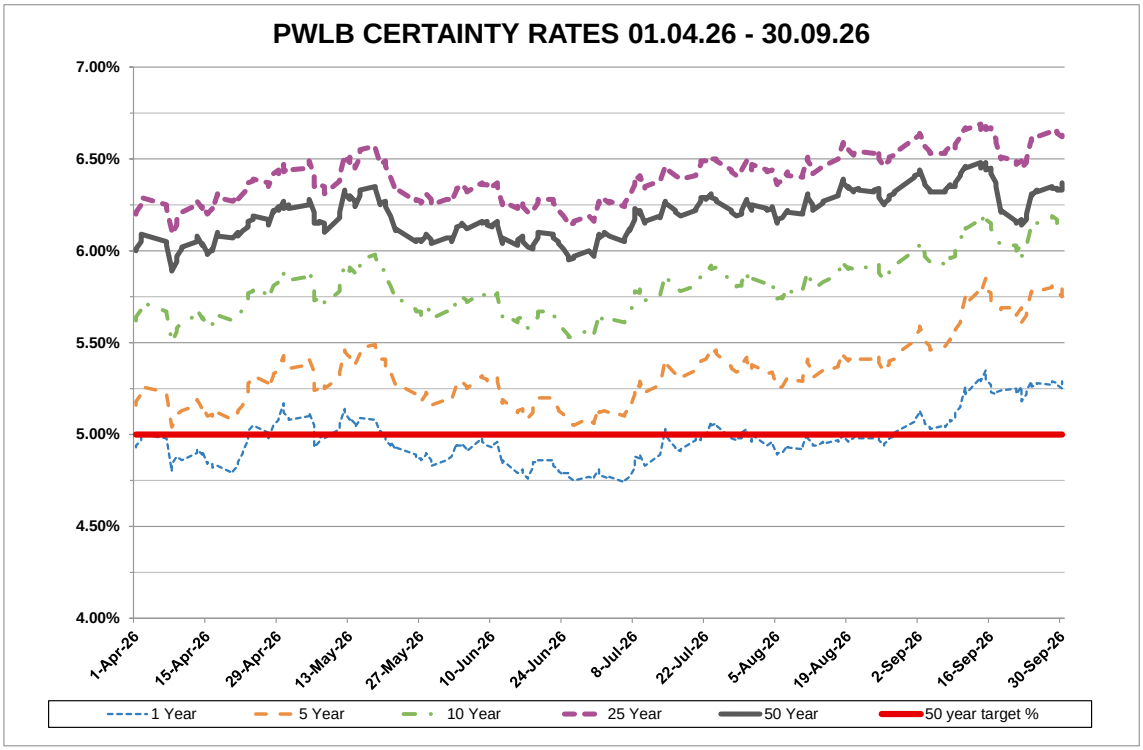
7.5. Gilt yields and PWLB Certainty Rates have remained volatile throughout the first six months of the financial year, but the general trend has been for the whole curve to shift higher on the back of inflation concerns and a pessimistic outlook for fiscal aspects, both domestically and internationally.

7.6. Consequently, the bulk of the low points in the charts below relate to early April 2026 with the highs congregated around mid-September. The spreads have ranged from 0.59% in the 50-year part of the curve through to 0.81% in the 5-year part of the curve.

7.7. The Council's treasury advisers, MUFG Corporate Markets, forecast that rates will fall over the next one to three years

as inflation eases. In the near term, however, rates could rise further if energy price shocks arising from the Middle East lead to persistent second-round inflation effects. In that scenario, wage increases could keep inflation higher and require monetary policy to tighten further than currently forecast.

7.8. The forecasts below were prepared before the November MPC meeting at which the Bank of England increased the base rate. They had already assumed a single rise of 0.25% before the end of December. A swift resolution to the conflict in the Middle East could instead lead to a rapid fall in energy prices, easing inflation concerns and allowing monetary policy to ease. The current forecast is for CPI inflation to peak at 4.3% in early 2027 before falling back towards the 2% target by 2028.



High/Low/Average PWLB Rates for 01/04/2026-30/09/2026

	1 Year	5 Year	10 Year	25 Year	50 Year
01/04/2026	4.93%	5.16%	5.62%	6.20%	6.00%
30/09/2026	5.29%	5.80%	6.17%	6.67%	6.37%
Low	4.74%	5.04%	5.50%	6.09%	5.89%
Low date	06/07/2026	08/04/2026	08/04/2026	08/04/2026	08/04/2026
High	5.35%	5.85%	6.21%	6.70%	6.48%
High date	15/09/2026	15/09/2026	15/09/2026	15/09/2026	14/09/2026
Average	4.98%	5.34%	5.81%	6.40%	6.19%
Spread	0.61%	0.81%	0.71%	0.61%	0.59%

7.9. The current PWLB rates are set as margins over gilt yields as follows:

- PWLB Standard Rate is gilt plus 100 basis points (G+100bps)
- PWLB Certainty Rate (GF) is gilt plus 80 basis points (G+80bps)
- PWLB Local Infrastructure Rate is gilt plus 60 basis points (G+60bps)
- PWLB Certainty Rate (HRA) is gilt plus 40bps (G+40bps)

8. Debt Rescheduling

8.1. Debt repayment and rescheduling opportunities have increased over the course of the past six months and will be considered if giving rise to long-term savings. However, no debt repayments or rescheduling have been undertaken to date in the current financial year.

8.2. The Council has one Lender Option, Borrower Option (LOBO) loan in its portfolio. Under this type of loan, the lender can offer the Council to either change the interest rate or repay the loan on certain loan anniversary dates. The next time this may occur is in June 2028 and therefore will not affect the current financial year.

8.3. The table below shows the Debt Maturity Prudential Indicator as at 30th September 2026. This indicator helps ensure that the Council's debt repayments are spread over a reasonable period. Limits for shorter-dated loans were previously increased in response to higher longer-term loan rates, on the assumption that shorter-term loans would be refinanced at maturity.

Debt Maturity	£m	% of Total Debt	% of Running Total Debt	% for Lower and Upper Limit of Debt
Under 12 months	12.75	18.03%	18.03%	0%-50.0%
Up to 2 Years	32.50	45.97%	64.00%	0%-75.0%
Up to 5 Years	17.46	24.69%	88.69%	0%-90.0%
Up to 10 Years	1.00	1.41%	90.10%	0%-92.5%
Up to 20 Years	3.00	4.24%	94.34%	0%-95.0%
Up to 30 Years	0.00	0.00%	94.34%	0%-100.0%
Up to 40 Years	2.00	2.83%	97.17%	0%-100.0%
Over 40 Years	2.00	2.83%	100.0%	0%-100.0%
Total Debt	70.71	100.0%	100.0%	

9. Compliance with Treasury and Prudential Limits

9.1. It is a statutory duty for the Council to determine and keep under review the affordable borrowing limits. During the first half of the financial year (which ended 30 September 2026), the Council has operated within the treasury and prudential indicators set out in the Council's Treasury Management Strategy Statement for 2026/27.

9.2. The Strategic Director for Resources reports that no difficulties are envisaged for the current or future years in complying with these indicators, and the Treasury Management team will continue to review the indicators to ensure this will continue to be the case.

9.3. All treasury management operations have also been conducted in full compliance with the Authority's Treasury Management Practices.

10. Annual Investment Strategy

10.1. The Treasury Management Strategy Statement (TMSS) for 2026/27, which includes the Annual Investment Strategy, was approved by the Council on 25th February 2026. In accordance with the CIPFA Treasury Management Code of Practice, it sets out the Authority's investment priorities as being:

- Security of capital
- Liquidity
- Yield

10.2. The Council aims to achieve the optimum return (yield) on its investments commensurate with proper levels of security and liquidity and with the Council's risk appetite. In the current economic climate, it is considered appropriate to keep investments short term to cover cash flow needs, but also to seek out value available in periods up to 12 months with high credit quality financial institutions, using the MUFG suggested creditworthiness approach, including a minimum sovereign credit rating and Credit Default Swap (CDS) overlay information

10.3. Creditworthiness

10.4. The UK's Sovereign rating has proven robust in the first half of 2026/27, and there is no expectation for this to change in the near future.

10.5. Investment Counterparty criteria

10.6. The current investment counterparty criteria selection approved in the TMSS meets the requirements of the Treasury management function and no updates are required.

10.7. Investment Balances

10.8. The average level of funds for investment purposes during the first half of the 2026/27 financial year was £16.64m. These funds were available on a temporary basis, and the amount depends on the timing of income, precept payments, the progress of the Capital programme and other expenditure.

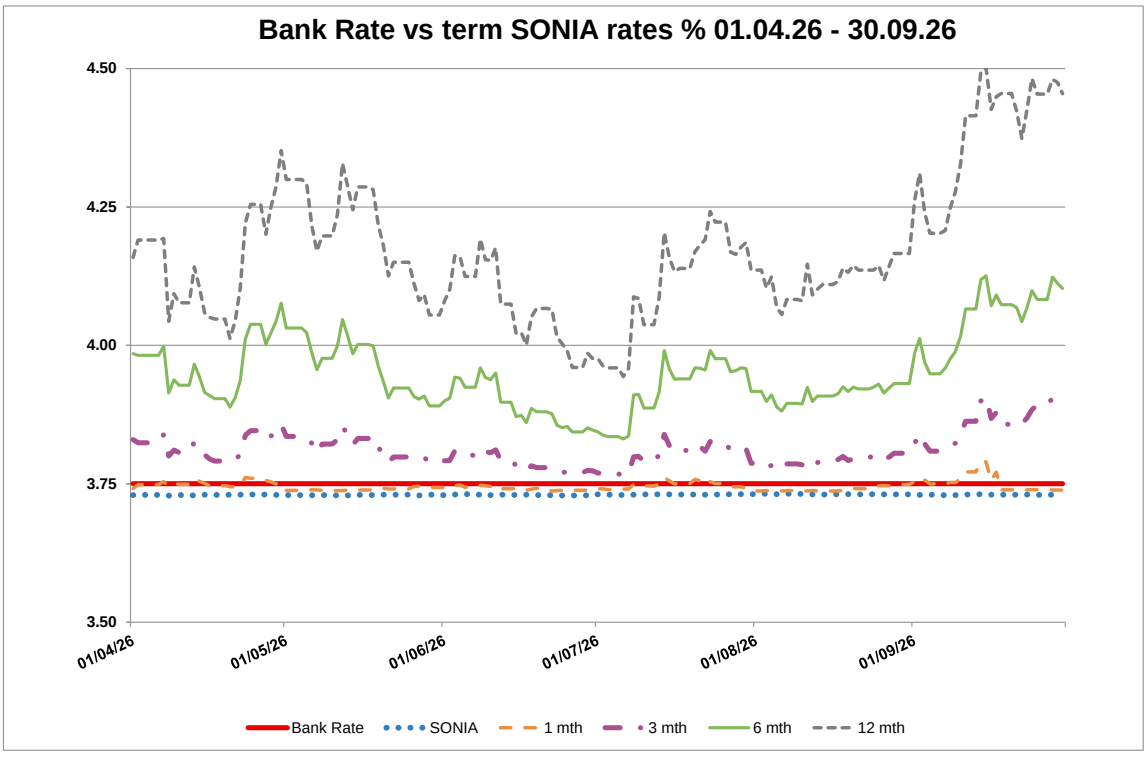
10.9. A list of all investments held as at 30th September 2026 is shown below:

Counterparty	Amount Invested	Deposit Period	Maturity Date	Interest Rate
Fixed Term Deposit:				
Total Fixed Term Deposits	£0.00m			N/A
Notice Accounts:				
Total Notice Accounts	£0.00m			N/A

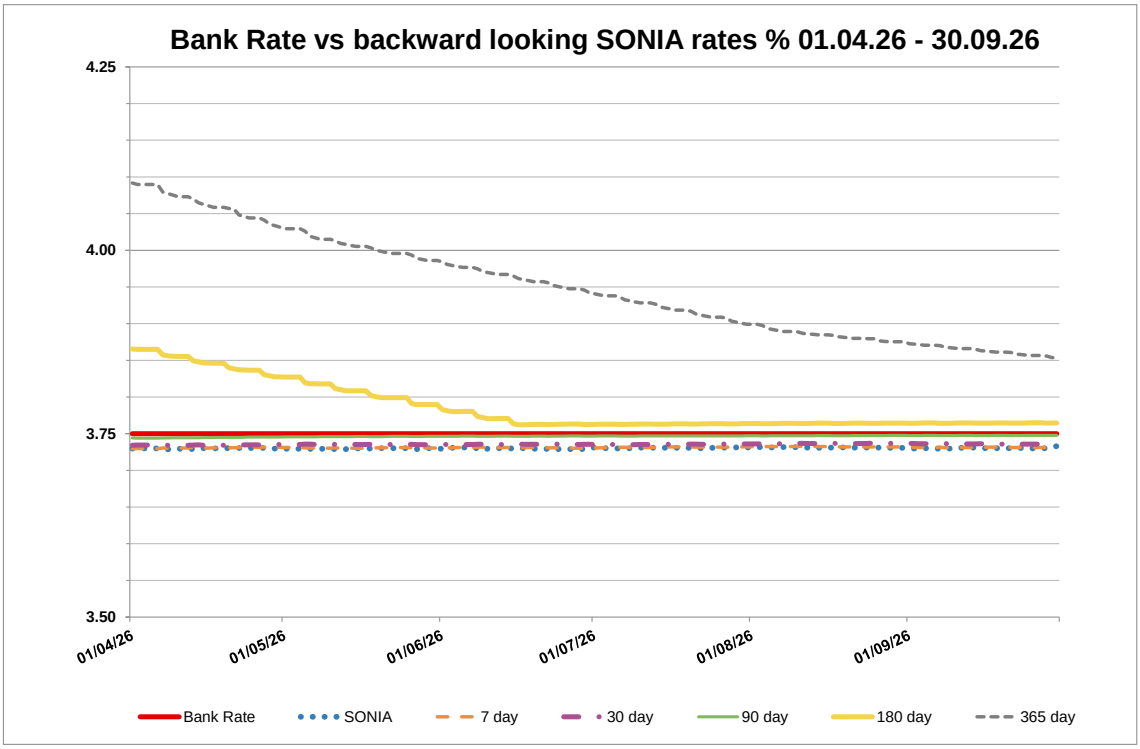
Property Funds				
CCLA Local Authority Property Fund	£2.00m	N/A	N/A	4.21%
Total Property Funds	£2.00m			4.21%
Money Market Funds:				
Federated Prime Rate	£7.00m	N/A	N/A	3.92%
Total Money Market Funds	£7.00m			3.92%
Instant Access/Call Accounts				
Lloyds Bank (Current Account)	£2.14	Overnight	N/A	3.65%
Total Instant Access	£2.14m			3.65%
Total Investments	£11.14m			3.92%

10.10. The current investment counterparty criteria selection approved in the TMSS is meeting the requirement of the treasury management function, and no in year changes are required.

Investment performance year to date as of 30th September 2026



	Bank Rate	SONIA	1 mth	3 mth	6 mth	12 mth
High	3.75	3.73	3.79	3.91	4.13	4.50
High Date	01/04/2026	30/09/2026	14/09/2026	15/09/2026	15/09/2026	15/09/2026
Low	3.75	3.73	3.74	3.77	3.83	3.94
Low Date	01/04/2026	09/06/2026	22/06/2026	06/07/2026	06/07/2026	06/07/2026
Average	3.75	3.73	3.75	3.81	3.95	4.17
Spread	0.00	0.01	0.05	0.14	0.29	0.56



	Bank Rate	SONIA	7 day	30 day	90 day	180 day	365 day
High	3.75	3.73	3.73	3.74	3.75	3.87	4.09
High Date	01/04/2026	30/09/2026	10/08/2026	25/08/2026	18/09/2026	01/04/2026	01/04/2026
Low	3.75	3.73	3.73	3.73	3.74	3.76	3.85
Low Date	01/04/2026	09/06/2026	01/04/2026	01/04/2026	02/04/2026	16/06/2026	30/09/2026
Average	3.75	3.73	3.73	3.74	3.75	3.79	3.95
Spread	0.00	0.01	0.00	0.00	0.00	0.10	0.24

Investment performance year to date as of 30th September 2026

7 Day SONIA Benchmark Return	NBBC Performance	Investment Interest Earned
3.73%	3.82%	£318,947

10.11. The graphs above compare SONIA with the Bank of England base rate over the last quarter. SONIA reflects the average rate at which banks borrow overnight without collateral. The term rate reflects expectations of borrowing rates, whereas backward-looking SONIA reflects rates

actually observed. NBBC uses backward-looking SONIA to compare expected investment returns with the returns achieved.

10.12. As shown, the combined Council and HRA investment portfolio is outperforming the 7 Day Benchmark by 9 Basis Points. The 7 Day Benchmark was chosen as the average length of investments for the Council is around 7 days.

10.13. The Council's budgeted investment return for 2026/27 is £540k, and the current forecast is a return of around £561k for both the HRA and General Fund.

10.14. Approved Limits

10.15. Officers can confirm that the approved limits within the Annual Investment Strategy were not breached during the first half of the Financial year of 2026/27

10.15.1. There have also been no breaches between the 1st October 2026 and the creation of this report.

11. The Council's Debt Position as at 30th September 2026

11.1. The Council's borrowing activity for the first half of the financial year can be summarised as follows:

- The repayment of a Short-term Local Authority Loan of £5.0m
- £5.0m of long-term debt matured in the first half of the year for a total of £10.0m of debt repaid in 26/27.
- £70.705m of debt is outstanding as of 30th September 2026 with the average rate of the loans being 3.97%. There is £5.0m of debt due to be repaid in 2026/27 all with the PWLB for the HRA.

11.2. Due to the current high interest rates, officers are minimising new external borrowing and delaying borrowing where possible, in anticipation for more favourable rates. However, borrowing will be undertaken where required to meet the Council's cashflow needs.

11.3. The Council's Debt Position as at 30th September 2026 is shown below:

Borrowing	2026/27 Opening Balance £m	Balance as of 30th Sept 2026 £m	2026/27 Closing Forecast £m
General Fund			
PWLB (Public Works Loan Board)	19.75	19.75	29.75
Market LOBO	2.00	2.00	2.00
LA Loan	5.00	0.00	0.00
HRA			
PWLB	53.96	48.96	58.96
Total	80.71	70.71	90.71

12. Consultation with the public, members, officers and associated stakeholders

12.1. None directly related to this report.

13. Financial Implications

13.1. Contained within the report.

14. Legal Implications

14.1. None directly related to this report.

15. Equalities implications

15.1. Not applicable to this report.

16. Health implications

16.1. Not applicable to this report.

17. Environmental implications

17.1. No direct climate and/or environmental implications have been identified.

18. Section 17 Crime and Disorder Implications

18.1. Not applicable to this report.

19. Risk management implications

19.1. Treasury management exposes the Council to risks arising from volatile interest rates and from its investment and borrowing activities, including risks to the security of investments. The Quarterly Treasury Management Report forms part of the Council's procedures for monitoring and mitigating these risks.

20. Human resources implications

20.1. No direct human resource implications have been identified.

21. Biodiversity Implications

21.1. No direct biodiversity implications have been identified

22. Local Government Reorganisation (LGR) Implications

22.1. No direct LGR implications have been identified noting the decision is currently 'Minded too', but subject to a LGR decision, treasury will be an area for review across the merging Councils.

23. Conclusion

23.1. This report demonstrates the Council's commitment to providing transparency on its investments and borrowing. The Audit & Standards Committee is invited to note the Treasury Management 2026/27 – Midyear Report.

24. Appendices

24.1. Please note there are no appendices attached to this Report

25. Background papers

25.1. Please note there are no background papers attached to this report.

26. Report Writer Details:

Officer Job Title: Treasury and Technical Business Partner

Officer Name: Andrew Pillow

Nuneaton & Bedworth
United to Achieve

AGENDA ITEM NO. 9

NUNEATON AND BEDWORTH BOROUGH COUNCIL

Report to:	Audit and Standards Committee
Date of Meeting:	1 December 2026
Subject:	Review of the Register of Members' Interests and the Gifts and Hospitality Register 2025 - 2026
Portfolio:	Not Applicable
Responsible Officer:	Monitoring Officer
Corporate Plan – Theme:	Your Council
Corporate Plan – Aim:	Strive for transparency and accountability, in all that we do. Increase public scrutiny
Ward Relevance:	n/a
Public or Private:	Public
Amendment to Budget	No
Council Tax Related:	No
Recommendation to Council:	No
Forward Plan:	Not applicable (not for Cabinet)
Subject to Call-in:	Not applicable (not for Cabinet)

1. Purpose of report

1.1. This report provides the Audit and Standards Committee with information regarding the registration of Members' Interests and, Gifts and Hospitality by Members and Officers for the period 24 October 2025 – 27 October 2026.

2. Recommendations

2.1. That the contents of the Register of Members' Interests between 24 October 2025 and 27 October 2026 be considered and noted; and

2.2. That the contents of the Register of Gifts and Hospitality for Members and Officers between 24 October 2025 and 27 October 2026, as set out in Appendix A, be considered and noted.

3. Background

3.1 The Nuneaton and Bedworth Borough Council (NBBC) Constitution specifies that one of the roles of the Audit and Standards Committee (the Committee) is to oversee and develop the Council's Code of Conduct and the overall standards of conduct for Council Members and co-opted Members. The Committee has the role of granting dispensations to both elected and independent Members, having regard to all relevant circumstances as detailed in the Constitution (A9.3.)

3.2 The Localism Act 2011 (the Act) introduced Disclosable Pecuniary Interests (DPIs) which Members are required to disclose either in advance or at a meeting where that interest is engaged.

3.3 It is included in the Work Programme of the Committee that a report will be presented to the November 2026 meeting on the operation of the Register of Members' Interests and Gifts and Hospitality by Members and Officers. This is therefore an opportunity for the Committee to be appraised of and review the operation of the Register of Members' Interests and, Gifts and Hospitality by Members and Officers for the period 24 October 2025 – 27 October 2026.

4. Body of report and reason for recommendations

4.1. As detailed in paragraph 3.1 above, the Standards responsibilities of the Committee are to oversee and develop the Council's Code of Conduct and the overall standards of conduct for Council Members and co-opted Members. Therefore, information relation to the operation of the Register of the Members' Interests is provided to inform this role of the Committee.

Operation of Member's Register of Interests (ROI)

4.2. Section 29 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of interests of Members of the authority. Within 28 days of becoming a Member or their re-election or re-appointment to office they must complete an ROI form and send it to the Monitoring Officer for registration.

4.3 Upon election each Councillor is provided with a pack that contains a number of documents, one of which is the Register of Interest form that Councillors are asked complete and return to the Monitoring Officer within 28 days of being elected. The ROI form contains guidance notes to assist Councillors in completing the form.

4.4 The administration of the forms is managed by Democratic Services. As soon as new and updated forms are received from Councillors, the content is added to the Committee Management System and documented on the Council's website. In accordance with the Act a paper Register is also kept in the office and is available should a member of the public request to view this.

4.5 Elected members are reminded at the start of each meeting to declare any changes and/updates to their list of declarations available on the website. From this, Councillors may update their forms accordingly. In addition, if it is brought to the attention of the Monitoring Officer that there could be an omission on the form of a Councillor, contact is made with that Councillor to discuss their form and to ascertain whether it requires updating. Ultimately, however, it is the responsibility of Councillors rather than Officers to complete the Register entries correctly.

4.6 A new section (S32A) was included into the Localism Act 2011 (as inserted by section 65 of the English Devolution

and Community Empowerment Act 2026). It made it clear that a Member's home address should not be disclosed on the Authority's public register of interest unless the Member has requested otherwise. Therefore, from the 29 June 2026, Local Authorities must not publish an elected or co-opted Member's home address in Local Authority registers of interest.

4.7. To aid transparency, public registers of interest still state that a Member has an interest the address of which is withheld. The exact address details are still declared to the Monitoring Officer, remain available internally to authorities and will continue to prevent conflicts of interest.

4.8 As a result, from 29th June 2026, all elected and co-opted Member's home addresses were redacted/removed from local authority registers of interest under updated legislation including the English Devolution and Community Empowerment Act 2026 and the Localism Act 2011. The exact address details remain available to the Monitoring Officer and the Democratic Services team for internal use only so that they can continue to prevent conflicts of interest. Members therefore disclose that they have an interest, but the details are withheld from the public register.

Gifts and Hospitality

4.9. It is best practice and also in line with the recommendations of the Committee for Standards in Public Life that the Council maintains a Register of gifts and hospitality. A further recommendation of the Committee for Standards in Public Life is that the register is reviewed by the Audit and Standards Committee at least once a year. The purpose of this Committee considering the Register is to ascertain whether there are any issues or to put forward recommendations on best practice. Nuneaton and Bedworth Borough Council has adopted a Gifts and Hospitality Policy which is contained in its Constitution (section 6.2.)

4.10. In accordance with Section 117 of the Local Government Act 1972, supplemented by the Council's Gifts and Hospitality Policy, Officers are required to make declarations.

4.11. The Work Programme of the Committee includes the annual review of the Register of Members and Officers Gifts and Hospitality.

4.12. Appendix A, details the Register of Gifts and Hospitality of Members and Officers between 24 October 2025 – 27 October 2026. The Committee should not request in open public session a name/recipient but Members of the Committee can comment on specific items. The recipient column has been redacted as it identifies an individual's identity, who in most cases, are non-senior staff. Paragraph 1 and 2 of Schedule 12A to the Local Government Act 1972 classifies the following, amongst other options, as exempt information for the purposes of Access to Information:

1. Information relating to any individual.
2. Information which is likely to reveal the identity of an individual.

Therefore, as classified as exempt information, If the Committee wish to obtain information, they must move to private session which will allow the Monitoring Officer to provide further information to the Committee regarding the recipient column.

4.13. The Committee is asked to review the Register and to consider whether there are any issues that need addressing, such as whether the Committee feels that there are omissions from the Register. It is recognised that these may be difficult to identify, but Committee Members may be aware of events that Officers and Members have attended in some capacity, which should be recorded.

4.14. As for the Members Register of Interests, it is good practice for the Monitoring Officer to write to all Members and Officers to remind them of the importance of keeping the Gifts and Hospitality Register accurate and up to date. This ensures openness and transparency and also ensures that that the public have confidence in the Governance arrangements of the Council.

Reasons for Recommendations

4.15. The recommendations are intended to enable the Committee to be appraised of the operation of the Register of Members' Interests and thereby enable it to carry out its Standards responsibilities effectively.

4.16. The annual Work Programme of the Committee states that a report shall be presented to the November 2026 meeting of the Committee for consideration and information.

4.17. To promote compliance by all Councillors with the requirement to register their pecuniary interest in the Councils' publicly available register.

4.18. To promote compliance by all Councillors with the Member Code of Conduct in being open and transparent about their personal interests.

4.19. To maintain the public's confidence that all Councillors and Officers are putting the public interest first and are not benefiting their own financial affairs from being a councillor.

5. Consultation with the public, members, officers, and associated stakeholders

5.1. This is an update report for the Committee's information and is therefore not appropriate for wider consultation.

6. Financial Implications

6.1. There are no direct financial implications arising from this report.

6.2. There are no direct manpower implications arising from this report; however, the Committee will be aware that the handling and processing of the Register of Interests is resource intensive.

7. Legal Implications

7.1. Section 29 of the Localism Act 2011 requires the Monitoring Officer to establish and maintain a register of interests of members of the authority. Within 28 days of becoming a Member or the re-election or re-appointment to office, the Councillor must register with the Monitoring Officer.

7.2. Councillors must ensure that their Register of Interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer.

7.3. Failure to appropriately declare and act on prejudicial interests would mean that the Councillors has not complied with the Code of Conduct and may have committed a criminal offence. It may also leave a Council decision in which the Councillor has participated open to legal

challenge. Failure to declare and register significant personal interests could mean that the Councillor has not complied with the Council's Code of Conduct.

7.4 Section 117 of the Local Government Act 1972, and supplemented by the Council's Gifts and Hospitality Policy, Officers and Members are required to make declarations of any gifts and hospitality that they have been offered and to state whether it was received.

8. Equalities implications

8.1. There are no direct equality implications arising from this report.

9. Health implications

9.1. There are no immediate health implications arising from this report.

10. Environmental implications

10.1. There are no direct climate and implications arising from this report

11. Section 17 Crime and Disorder Implications

11.1. No direct Section 17 crime and disorder implications have been identified.

12. Risk management implications

12.1. No direct risk management implications have been identified.

13. Human resources implications

13.1. No direct human resource implications have been identified.

14. Biodiversity Implications

14.1. No direct biodiversity implications have been identified.

15. Local Government Reorganisation (LGR) Implications

15.1. No direct Local Government Reorganisation implications have been identified.

16. Options considered and reason for their rejection

16.1. In formulating this report and recommendations, the following other options were identified. Reasons for their rejection or why the option and recommendation proposed in section 2 of the report has been selected are outlined below.

Option Ref	Option Title	Reason for rejection or why the option and recommendation proposed in section 2 of the report has been selected
A	Do Nothing	The Audit and Standards Committee has an obligation to promote and maintain high standards of conduct by Members, Independent Members and any other representatives. Therefore, this report provides an annual update Review of the Register of Members' Interests and the Gifts and Hospitality Register 2025 – 2026.

17. Conclusion

17.1. The Committee to note that it is included in the Work Programme of the Committee that a report will be presented to the November 2026 meeting on the operation of the Register of Members' Interests and Gifts and Hospitality by Members and Officers. This is therefore an opportunity for the Committee to be appraised of and review the operation of the Register of Members' Interests and, Gifts and Hospitality by Members and Officers for the period 24 October 2025 – 27 October 2026.

18. Appendices

18.1. Please note the following appendices:

i. Appendix A – Redacted Register of Gifts and Hospitality for Members and Officers between 24 October 2025 and 27 October 2026.

19. Background papers

19.1. The Register of Members Interest

19.2. The Register of Gifts and Hospitalities for Members and Officers

19.3. The annual Work Programme 2025/26 of the Audit and Standards Committee

20. Report Writer Details:

Officer Job Title: Elections and Democratic Services Manager & Deputy Monitoring Officer

Officer Name: Tracy Tiff

Nuneaton & Bedworth Borough Council

Appendix A

Register of gifts and hospitality - Officers and Members 24 October 2025 - 27 October 2026

Date informed of gift or hospitality	Date gift or hospitality received	Recipient *	Person or company offering gift or hospitality	Brief details of gift or hospitality	Approximate value of gift or hospitality	Reason for accepting gift or hospitality	Has this been received before
11/11/2025	11/11/2025		Tenant	Small box of biscuits & a can of Tango Orange	£4	Customer wanted to give refreshments following my completion of assessment. I did decline initially; however the customer was insistent, and I did not want to cause offence	No
12/11/2025	13/11/2025		Company	Brochure and welcome back from Davitt Jones Bould (a legal firm) via the post which included a Davitt Jones Bould branded A5 note book and pen. Not requested by me. The welcome pack includes a brochure about the legal firm, Planning Law updates for Local Authorities (September 2025), points of contact for day-to-day queries, a 2024 Year Book as well as the note book.	£7.50	Davitt Jones Bould were successful in a recent tender exercise for the Council's Legal Services Framework Agreement, upon which they were ranked 2nd under Lot 1 – Planning. As sent in the post without requesting, and following a legitimate procurement process, there does not appear to be an ulterior motive.	No
21/11/2025	26/11/2025		Company	Finger foods offered and a welcome drink	£10	Invitation to the soft launch opening of the premises	No
05/12/2025	04/12/2025		Company	General provision of free marketing samples and discounts for staff; value varies so noted as approximate per campaign below; average of 2-3 campaigns per year	£250	Marketing and employee benefits	Yes
05/12/2025	05/12/2025		Tenant	Bottle of white wine	£7	The tenant stated she was grateful for all my help and getting them moved into another property	No
03/12/2025	08/12/2025		Sole Trader	Market trader on the Nuneaton market selling fresh / frozen fish. 10% discount to NBBC employees per order	10% discount for NBBC employees	Offer for NBBC employees with an NBBC I D badge	No

15/12/2025	15/12/2025		Member of the public	Council tenant has given two Engagement Officers two £10 Costa Coffee gift cards as a thank you for including her in the Involved Tenant programme. I line manage both Officers	£20 total	A thank you for operating the Involved Tenant programme	No
16/12/2025	16/12/2025		Company	Chocolates and biscuits	£20	Christmas treats to say thanks to the Housing Solutions Team	No
12/01/2026	12/01/2026		Company	A small rosemary tree to be planted.	£8	Winners of a Christmas competition	No
07/01/2026	27/02/2026		Local Forum	Invitation to the annual awards event on Friday 27th February 2026, as an awards nominee. Invite to awards event and meal.	£50	Nomination for an award	No
27/01/2026	03/02/2026		Members of Royal family	Reception at St James' Palace by the Kind and Queen	Light refreshments	Nominated by NBBC. Reception to recognise the contributions of those who work in local and regional government.	No
13/02/2026	13/02/2026		Local Authority	Sandwich (x2)	£5	On site meeting related to Local Government Reorganisation planning	No
02/02/2026	02/04/2026		Residents	Voucher as Thank You Gift	£7	Thank You Gift	No
24/03/2026	19/03/2026		Former Employee of NBBC	Plant Pot	£10	Leaving Present	No
02/04/2026	02/04/2026		Resident	Voucher as Thank You Gift	£8	Thank You Gift	No
02/04/2026	02/04/2026		Resident	Voucher as Thank You Gift	£7	Thank You Gift	No
13/04/2026	12/04/2026		Member of the public	Flowers	£10	For helping with enquiry	No
27/04/2026	27/04/2026		University	Working buffet lunch at Warwick University	£15	Lunch for a conference day associated to Warwickshire Local Government Re-organisation as the main kick off event for the programme	No
01/05/2026	07/04/2026		Member of the public	Bottle Wine	£8	Put up and take down her temporary exhibition at the Museum	Yes
26/06/2026	25/05/2026		Member of the public	Box x 20 Ferrero Rocher Chocolates and mini patio rose plant	£22	Set up his first solo temporary exhibition offering advice also	No
29/05/2026	29/05/2026		Former Employee of NBBC	Box of Chocolates	£5	Expression of gratidude / token. Passed to Elections Team	No

09/07/2026	07/07/2026		Tenant	large dairy milk chocolate bar/bottle of wine.	£10	I am dealing with a case with police concerning a property. Both me and police got given the gift for all the support along with a message sent to management of how well we have managed the case. This case has been going on for 14 months and continues. Gift was given as a thank you for all the work and support which has gone into the case.	No
12/08/2026	08/10/2026		Consultants	Consultants have offered a seat at their hospitality table for the UK Active Awards event (Thursday 8th Oct 2026), where NBBC with its Bedworth Physical Activity Hub (BPAH) project has reached the finalist list for 2026.	£100	NBBC submitted an application for the UK Active Awards for the BPAH, to see if this project would be recognized as an award winning project for NBBC. The outcome will not be known until the evening awards. The project team of consultants have purchased a table for the event and offered a place to attend.	No
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23/09/2026	23/09/2026		National event	Attendance of national governing body event. As part of the day, teams were formed and an ongoing quiz throughout the day as part of the learning. With prize giving to winners at the end of the day. The prize total per member is approximately £11:00 each. prizes ranged from chocolates selections, wine, vouchers, car cleaning kit.	£100 total which once shared out to members of the team is approximately £11:00 each.	Winners of quiz, prizes given to share amongst the team of officers (consisting of 9 members)	No
18/10/2026	19/10/2026		Sole Trader	4 photographs taken during Nuneaton 10k run, I understand that they are a freelance photograher	Under £20	4 photographs sent to me via email of me running the Nuneaton 10k on Sunday 18th October,which are protrait pictures of me	No
09/11/2026	09/11/2026		Tenant	Bunch of flowers	£10	Thanks for support with ASB at the scheme	No

*** Note:** Column 3 (Recipient) has been redacted in accordance with the provisions of Part 1 and 2 of Schedule 12A of the Local Government Act 1972 and in relation to withholding Officers' names in accordance with Section 40(2) of the Freedom of Information Act, citing personal data protections